PREA Facility Audit Report: Final

Name of Facility: Nebraska State Penitentiary
Facility Type: Prison / Jail
Date Interim Report Submitted: NA
Date Final Report Submitted: 11/11/2026

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	☑
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	☑
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	☑
Auditor Full Name as Signed: Karen d. Murray	**Date of Signature:** 11/11/2026

AUDITOR INFORMATION	
Auditor name:	Murray, Karen
Email:	kdmconsults1@gmail.com
Start Date of On-Site Audit:	09/30/2026
End Date of On-Site Audit:	10/02/2026

FACILITY INFORMATION	
Facility name:	Nebraska State Penitentiary
Facility physical address:	4201 South 14th Street , Lincoln, Nebraska - 68502
Facility mailing address:	P.O. Box 22500, Lincoln, Nebraska - 68542

Primary Contact

Name:	Ronald Bailey
Email Address:	ronald.bailey@nebraska.gov
Telephone Number:	5315107041

Warden/Jail Administrator/Sheriff/Director	
Name:	Barbara Lewien, Warden
Email Address:	Barbara.Lewien@nebraska.gov
Telephone Number:	402-479-3216

Facility PREA Compliance Manager	
Name:	Ronald Bailey
Email Address:	ronald.bailey@nebraska.gov
Telephone Number:	402-479-3309

Facility Health Service Administrator On-site	
Name:	Teena Lenger
Email Address:	teena.lenger@nebraska.gov
Telephone Number:	402-479-3290

Facility Characteristics	
Designed facility capacity:	818
Current population of facility:	1391
Average daily population for the past 12 months:	1312
Has the facility been over capacity at any point in the past 12 months?	Yes
What is the facility's population designation?	Men/boys

Age range of population:	19-82
Facility security levels/inmate custody levels:	Maximum, Medium, Minimum
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	440
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	2
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	453

AGENCY INFORMATION	
Name of agency:	Nebraska Department of Correctional Services
Governing authority or parent agency (if applicable):	
Physical Address:	801 West Prospector Place, PO Box 94661, Lincoln, Nebraska - 68522
Mailing Address:	PO Box 94661, Lincoln, Nebraska - 68509
Telephone number:	4024712654

Agency Chief Executive Officer Information:	
Name:	
Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information			
Name:	Danielle Reynolds	**Email Address:**	danielle.reynolds@nebraska.gov

Facility AUDIT FINDINGS

Summary of Audit Findings

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:	
4	• 115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator • 115.42 - Use of screening information • 115.71 - Criminal and administrative agency investigations • 115.73 - Reporting to inmates
Number of standards met:	
41	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

Please note: Question numbers may not appear sequentially as some questions are omitted from the report and used solely for internal reporting purposes.

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2026-09-30
2. End date of the onsite portion of the audit:	2026-10-02

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	(●) Yes ( ) No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	During the onsite audit, the hotline was tested, and the PREA Coordinator demonstrated that the test message was delivered directly to her email. The recorded hotline instructions informed callers that allegations of sexual abuse or sexual harassment could be submitted anonymously or with whatever identifying information and details the caller chose to provide. An additional reporting test was conducted through the Ombudsman's Office. The Ombudsman confirmed that the office responds to questions and concerns raised by incarcerated individuals and, upon receiving a report, contacts the Warden to communicate the information provided by the caller.

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	818
15. Average daily population for the past 12 months:	1377

16. Number of inmate/resident/detainee housing units:	9
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	○ Yes ◉ No ○ Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit

Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit

23. Enter the total number of inmates/ residents/detainees in the facility as of the first day of onsite portion of the audit:	1368
25. Enter the total number of inmates/ residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	441
26. Enter the total number of inmates/ residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	9
27. Enter the total number of inmates/ residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	13
28. Enter the total number of inmates/ residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	13

29. Enter the total number of inmates/ residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	51
30. Enter the total number of inmates/ residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	14
31. Enter the total number of inmates/ residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	4
32. Enter the total number of inmates/ residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	6
33. Enter the total number of inmates/ residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	186
34. Enter the total number of inmates/ residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	No text provided.

Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	440
37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	453
38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	2
39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.

INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	20

41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	☐ Age ☐ Race ☐ Ethnicity (e.g., Hispanic, Non-Hispanic) ☐ Length of time in the facility ☑ Housing assignment ☐ Gender ☐ Other ☐ None
42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	The facility provided incarcerated individual rosters organized by targeted categories and housing units. Once the Auditor selected individuals from the targeted categories, random individuals were selected by housing unit to ensure a diverse and representative sample.
43. Were you able to conduct the minimum number of random inmate/ resident/detainee interviews?	◉ Yes ○ No
44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	20

As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".

47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	1
48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	5
49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	1
50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	1
51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	2

52. Enter the total number of interviews conducted with inmates/residents/ detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	3
53. Enter the total number of interviews conducted with inmates/residents/ detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	2
54. Enter the total number of interviews conducted with inmates/residents/ detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	2
55. Enter the total number of interviews conducted with inmates/residents/ detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	4
56. Enter the total number of interviews conducted with inmates/residents/ detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	■ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.

b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/ residents/detainees).	The agency as a whole does not utilize segregated housing for their vulnerable populations.
57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.

Staff, Volunteer, and Contractor Interviews

Random Staff Interviews

58. Enter the total number of RANDOM STAFF who were interviewed:	12
59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	☐ Length of tenure in the facility ☑ Shift assignment ☑ Work assignment ☑ Rank (or equivalent) ☐ Other (e.g., gender, race, ethnicity, languages spoken) ☐ None
60. Were you able to conduct the minimum number of RANDOM STAFF interviews?	◉ Yes ○ No
61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.

Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	13
63. Were you able to interview the Agency Head?	(●) Yes ( ) No
64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	(●) Yes ( ) No
65. Were you able to interview the PREA Coordinator?	(●) Yes ( ) No
66. Were you able to interview the PREA Compliance Manager?	(●) Yes ( ) No ( ) NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

67. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)	☐ Agency contract administrator ☐ Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment ☐ Line staff who supervise youthful inmates (if applicable) ☐ Education and program staff who work with youthful inmates (if applicable) ☑ Medical staff ☐ Mental health staff ☐ Non-medical staff involved in cross-gender strip or visual searches ☑ Administrative (human resources) staff ☐ Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff ☑ Investigative staff responsible for conducting administrative investigations ☑ Investigative staff responsible for conducting criminal investigations ☑ Staff who perform screening for risk of victimization and abusiveness ☐ Staff who supervise inmates in segregated housing/residents in isolation ☑ Staff on the sexual abuse incident review team ☑ Designated staff member charged with monitoring retaliation ☑ First responders, both security and non-security staff ☑ Intake staff

	☐ Other
68. Did you interview VOLUNTEERS who may have contact with inmates/ residents/detainees in this facility?	◉ Yes ○ No
a. Enter the total number of VOLUNTEERS who were interviewed:	2
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	☐ Education/programming ☐ Medical/dental ☐ Mental health/counseling ☑ Religious ☑ Other
69. Did you interview CONTRACTORS who may have contact with inmates/ residents/detainees in this facility?	◉ Yes ○ No
a. Enter the total number of CONTRACTORS who were interviewed:	2
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	☐ Security/detention ☐ Education/programming ☑ Medical/dental ☐ Food service ☐ Maintenance/construction ☐ Other
70. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.

71. Did you have access to all areas of the facility?	(●) Yes ( ) No
Was the site review an active, inquiring process that included the following:	
72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	(●) Yes ( ) No
73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	(●) Yes ( ) No
74. Informal conversations with inmates/ residents/detainees during the site review (encouraged, not required)?	(●) Yes ( ) No
75. Informal conversations with staff during the site review (encouraged, not required)?	(●) Yes ( ) No

76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	No text provided.

Documentation Sampling

Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.

77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	(●) Yes ( ) No
78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	No text provided.

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.

79. Total number of SEXUAL ABUSE allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	4	0	4	0
Staff-on-inmate sexual abuse	3	0	3	0
Total	7	0	7	0

80. Total number of SEXUAL HARASSMENT allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	2	0	2	0
Staff-on-inmate sexual harassment	3	0	3	0
Total	5	0	5	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

Note: these counts should reflect where the investigation is currently (i.e., if a criminal investigation was referred for prosecution and resulted in a conviction, that investigation outcome should only appear in the count for “convicted.”) Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual abuse investigation files, as applicable to the facility type being audited.

81. Criminal SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual abuse	0	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0	0
Total	0	0	0	0	0

82. Administrative SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	1	3	0
Staff-on-inmate sexual abuse	0	1	2	0
Total	0	2	5	0

Sexual Harassment Investigation Outcomes

Note: these counts should reflect where the investigation is currently. Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual harassment investigation files, as applicable to the facility type being audited.

83. Criminal SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual harassment	0	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0	0
Total	0	0	0	0	0

84. Administrative SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	0	2	0
Staff-on-inmate sexual harassment	0	1	2	0
Total	0	1	5	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

85. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	6

86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	○ Yes ◉ No ○ NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	3
88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	○ Yes ◉ No ○ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	◉ Yes ○ No ○ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	3
91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	○ Yes ◉ No ○ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	6
94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	( ) Yes (●) No ( ) NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	3
96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	( ) Yes (●) No ( ) NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

Staff-on-inmate sexual harassment investigation files	
98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	3
99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	○ Yes ◉ No ○ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	◉ Yes ○ No ○ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	No text provided.

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

102. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	○ Yes ◉ No

Non-certified Support Staff	
103. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	(●) Yes ( ) No
a. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:	1
AUDITING ARRANGEMENTS AND COMPENSATION	
108. Who paid you to conduct this audit?	(●) The audited facility or its parent agency ( ) My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option) ( ) A third-party auditing entity (e.g., accreditation body, consulting firm) ( ) Other

Standards
Auditor Overall Determination Definitions
• Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions)
Auditor Discussion Instructions
Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Nebraska Department of Correctional Services Organizational Chart, dated 12.2025 4. Nebraska State Penitentiary Organizational Chart, not dated Interviews: 1. Random Incarcerated Individuals

2. Targeted Incarcerated Individuals

3. Corporals

4. Administrative Personnel

5. Administrative Program Officer / PREA Compliance Manager

6. Captain / PREA Coordinator

7. Warden

8. Deputy Director of Prisons Operations

Interviews with incarcerated individuals demonstrated a strong perception of sexual safety within the facility. All incarcerated individuals interviewed (100%) reported feeling sexually safe, and 100% indicated that staff conducted searches respectfully, although some described differences in staff approaches. Additionally, 100% reported being offered mental health services regardless of their risk assessment results. Incarcerated individuals expressed confidence in staff's commitment to sexual safety, describing the facility as a safe environment where staff take their responsibilities seriously. Individuals also reported that female staff generally respected their privacy and that staff routinely checked on their safety and well-being, including monthly inquiries about whether they felt safe. Several incarcerated individuals indicated they had not experienced sexual safety concerns during their incarceration at the facility.

Interviews with staff demonstrated a strong understanding of the agency's zero-tolerance policy and the importance of maintaining professional boundaries with incarcerated individuals. Staff described improvements in supervision and monitoring, including enhanced lines of sight in shop areas. Staff emphasized the importance of maintaining professional relationships, recognizing changes in incarcerated individuals' behavior, and proactively engaging individuals who appear isolated to assess their safety and well-being. Staff further demonstrated an understanding of appropriate communication techniques, including maintaining a calm and professional approach when responding to sensitive situations. Staff described addressing inappropriate conversations promptly, documenting continued inappropriate behavior, and consistently enforcing professional boundaries. Staff also emphasized the importance of ensuring incarcerated individuals have accessible avenues to communicate concerns and maintaining situational awareness to avoid circumstances that could compromise professional conduct or safety.

The interview with the PREA Compliance Manager demonstrated that he has sufficient time to fulfill his PREA-related responsibilities while balancing his other assigned duties. He described routinely reviewing PREA policies and incorporating their requirements into daily facility operations. Although he continues to refine how he manages his responsibilities, he indicated that he is able to prioritize and dedicate

	the necessary time to PREA-related matters as they arise. The PREA Compliance Manager further explained that he receives updates and guidance when changes occur within the agency's systems, including NICAMS, to ensure he remains informed of current procedures. He also participates in monthly meetings with the Agency PREA Coordinator, during which policy revisions, procedural updates, and incidents occurring throughout the agency are discussed. These meetings provide opportunities to evaluate incidents at other facilities, identify potential vulnerabilities, and implement preventive measures to reduce the likelihood of similar incidents occurring at the Nebraska State Penitentiary. The interview with the Captain/PREA Coordinator demonstrated that oversight and support of PREA Compliance Managers are provided through informational emails, scheduled meetings, informational memorandums, FAQ updates, mock audits, and onsite visits conducted by PREA and Regional personnel. Site Observations: During the tour consistent PREA-related information throughout the facility was observed, including standardized bulletin boards displaying PREA educational materials and audit notices in all observed areas. Housing unit logbooks demonstrated a substantial presence of administrative and supervisory staff throughout the facility. Additionally, staff were observed carrying first responder reference cards to support their responsibilities when responding to allegations of sexual abuse. (a) The Nebraska State Penitentiary PAQ states the agency Safe Prisons/PREA Plan mandates zero-tolerance toward all forms of sexual abuse and sexual harassment in the facility it operates and those directly under contract. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 1, section Purpose states, “To establish guidelines for detecting, preventing and handling occurrences, threats and allegations of sexual assault, sexual abuse and sexual harassment perpetrated against incarcerated individuals by incarcerated individuals, team members, contractors, official visitors or volunteers within the Nebraska Department of Correctional Services (NDCS) and to ensure compliance with federal Prison Rape Elimination Act (PREA) standards. NDCS expressly prohibits sexual contact or sexual acts between incarcerated individuals and between incarcerated individuals and team members, volunteers, official visitors or contractors. NDCS will cooperate with the Bureau of Justice

	Statistics (BJS) in providing required access to team members and incarcerated individuals, statistical information and data collection with regard to sexual assault, sexual abuse and sexual harassment of incarcerated individuals. In order to ensure compliance with PREA standards, NDCS shall conduct audits pursuant to the process outlined by the Department of Justice (DOJ). This policy applies to all persons, programs and institutions within the jurisdiction of NDCS. (b) The Nebraska State Penitentiary PAQ states the agency employs or designates an upper-level, agency-wide PREA Coordinator. The position of the PREA Coordinator in the agency's organizational structure is the PREA Captain. The facility provided a Nebraska Department of Correctional Services Organizational Chart. The organization chart demonstrates the Captain / PREA Coordinator is in the agency organizational structure and reports directly to the Assistant Deputy Director Intelligence & Investigations who reports directly to the agency Director. (c) The Nebraska State Penitentiary PAQ states the facility has designated a PREA Compliance Manager. The PREA Compliance Manager has sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards. The facility provided a Nebraska Department of Correctional Services Organizational Chart. The organization chart demonstrates the PREA Compliance Manager is in the agency organizational structure and reports directly to the Agency Security Administrator who reports directly to the Deputy Assistant Director. Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. The facility demonstrated a proactive and sustained commitment to sexual safety through consistent administrative oversight, ongoing staff engagement, and the integration of PREA principles into daily operations. All incarcerated individuals interviewed (100%) reported feeling sexually safe, receiving respectful treatment during searches, and being offered mental health services. Staff demonstrated a strong understanding of professional boundaries, recognized the importance of identifying potential vulnerabilities, and described proactive measures to address safety concerns. Additionally, the PREA Compliance Manager's ongoing policy review, monthly collaboration with the Agency PREA Coordinator, and evaluation of incidents occurring throughout the agency demonstrate a commitment to continuous improvement and prevention. These practices, supported by consistent PREA educational postings, supervisory presence, and readily available first responder resources, reflect an institutional approach to sexual safety that extends beyond the minimum requirements of the standard.

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ Interviews: 1. Captain / PREA Coordinator The interview with the PREA Coordinator demonstrated the agency does not currently contract with outside entities for the confinement or housing of inmates. As such, there are no current contracts for the confinement of inmates that require monitoring for compliance with PREA standards. (a) The Nebraska State Penitentiary PAQ states the agency does contract with seven private agencies for confinement services of their inmates. (b) The Nebraska State Penitentiary PAQ states the agency has zero contracts requiring the agency to monitor the contractor's compliance with PREA standards. The number of contracts referenced in 115.12 (a)-3 that do not require the agency to monitor contractor's compliance with PREA standards is zero. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2023

3. Nebraska State Penitentiary Annual Review of Staffing Assignment and Video Monitoring, 1.2026

4. Staffing Levels Deviation Documentation

5. Housing Unit Logs

6. Post Audit: Post Order Acknowledgment Form

7. Post Audit: Memorandum, RE: Housing Unit Area Checks, dated 10.29.2026

8. Post Audit: Memorandum, RE: PREA Standard 115.13 Supervision and Monitoring, dated 10.22.2026

Interviews:

1. Captain / PREA Coordinator

2. Associate Warden

The interview with the Associate Warden demonstrated that unannounced rounds are conducted at varying times throughout the day and in different areas of the facility to ensure unpredictability. The Associate Warden indicated that rounds do not follow a predictable schedule and are not announced in advance to staff. Central Control is notified when rounds are being conducted. During rounds, the Associate Warden interacts with incarcerated individuals when the yard is open. The Associate Warden also monitors the completion of required rounds by supervisory and administrative personnel, including Shift Supervisors, Sergeants, Majors, and Associate Wardens. All unannounced rounds are documented in the respective housing unit logbooks using red ink to distinguish supervisory rounds from routine entries.

The interview with the Associate Warden demonstrated that the facility maintains a staffing plan designed to ensure adequate staffing levels and effective supervision and monitoring of incarcerated individuals. The staffing plan is reviewed annually in collaboration with shift supervisors and the Agency PREA Coordinator. Additional administrative personnel participating in the review include the Captain, Major, Deputy Warden, and other designated administrators. The annual analysis addresses all required components of the standard, including an assessment of staffing levels, supervision practices, and monitoring needs. To monitor compliance with the staffing plan, the facility documents all deviations from established staffing levels through reports maintained in the NICAM system. The Associate Warden also indicated that an auxiliary post had been closed as part of the facility's staffing operations.

The interview with the Agency PREA Coordinator demonstrated that she meets annually in February with each Warden and PREA Compliance Manager to review and

	complete the facility's Staffing Assignment and Video Monitoring Plans. Site Observation: During the facility tour, cell doors in Housing Unit 5 were observed to remain open as a standard practice. The blinds in the GED testing room were observed fully lowered, limiting visibility into the room. Additionally, an area located behind the freezer in the internal kitchen was identified as a blind spot with limited staff visibility and supervision. Corrective Action Plan: Review the identified areas within Housing Unit 5, the GED testing room, and the internal kitchen to determine and implement appropriate measures to enhance visibility and supervision and reduce opportunities for sexual abuse. Develop and implement a process addressing the practice of leaving cell doors open in Housing Unit 5 and ensuring staff maintain appropriate supervision of Incarcerated Individuals. Implement a sustainable practice for maintaining appropriate visibility into the GED testing room while considering legitimate privacy and operational needs. Address the identified blind spot behind the freezer in the internal kitchen through appropriate physical-plant, mirror, camera, staffing, or supervisory measures. Provide documented training to applicable staff regarding any revised supervision, monitoring, or physical-plant practices implemented as a result of the corrective action. Appropriate facility personnel shall provide a memorandum outlining the sustainable action plan and identifying the designated position responsible for ongoing oversight to ensure the corrective measures are consistently implemented and maintained. The memorandum shall be addressed to the DOJ PREA Auditor and include the date, author, and applicable standard. Upload the memorandum, training records, photographs or other evidence of physical-plant modifications, and all supporting documentation to the corresponding provision within the Online Audit System. Post audit, a memorandum was provided by the agency PREA Coordinator, addressed to the DOJ PREA Auditor, providing documentation demonstrating corrective actions implemented to address potential blind spots and strengthen supervision of incarcerated individuals. Revised housing unit post orders establish procedures for controlling cell and dayroom doors, limiting the number of doors open simultaneously, and monitoring incarcerated individual movement. Documentation demonstrated that staff assigned to housing unit control doors reviewed and signed the post orders. The facility also established a dedicated live video monitoring team and designated the Unit Administrator and Unit Case Managers to conduct quality assurance reviews to ensure compliance with door procedures and prevent vulnerable

	and aggressive incarcerated individuals from being isolated together. Additional corrective actions included removing blinds from the GED classroom window to improve visibility during staff rounds and relocating movable bread racks from the kitchen refrigerator/freezer area during incarcerated individual access to eliminate potential blind spots. The facility provided photographic documentation supporting these modifications. (a) The Nebraska State Penitentiary PAQ states the agency requires the facility to develop, document and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect inmates against abuse. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of inmates is 1289. The average daily number of inmates on which the staffing plan was predicated is 1289. The facility provided a Nebraska State Penitentiary Annual Review of Staffing Assignment and Video Monitoring plan. The document documents the following components. a. Generally accepted adult correctional institution practice. b. Any judicial findings of inadequacy. c. Any findings of inadequacy from federal investigative bodies. d. Any findings of inadequacy from internal or external oversight bodies. e. All components of the facility's physical plant, including blind spots or areas where team members or inmates may be isolated. f. The composition of the resident population (i.e.-gender rations, risk/need of residents, physical size, Sexual Aggressive Behavior (SAB), Vulnerability to Victimization (VV). g. The number and placement of supervisory staff. h. Institutional programs occurring on shifts. i. Any applicable state or local laws, regulations or standards. j. The prevalence of substantiated and unsubstantiated incidents of sexual abuse. k. Any other relevant factors.

	The plan is signed and dated by the NSP PREA Compliance Manager, facility Warden and the NDCS PREA Coordinator. (b) The Nebraska State Penitentiary PAQ states each time the staffing plan is not complied with, the facility documents and justifies deviations. The PAQ states, “Sick leave, Vacation/Annual Leave, Military Leave, Training, Community Hospital Coverage, Emergency Travel Orders. The facility provided Staffing Levels Deviation documentation demonstrating documentation of the deviation, incident date, incident type, facility, incident report details and FTE, minimum and critical staffing levels are documented. (c) The Nebraska State Penitentiary PAQ states at least once every year the facility/agency, in collaboration with the PREA coordinator, reviews the staffing plan to whether adjustments are needed in (a) the staffing, (b) the deployment of monitoring technology, or (c) the allocation of agency/facility resources to commit to the staffing plan to ensure compliance with the staffing plan. The facility completes a staffing plan annually to ensure continued compliance with each required element of the staffing plan. (d) The Nebraska State Penitentiary PAQ states the facility requires that intermediate level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 8, section 3., states, “Each facility shall implement a policy and practice of having intermediate-level and higher-level supervisors conduct and document unannounced rounds, on all shifts, to identify and deter team members from sexual abuse/assault and sexual harassment. Specific expectations are detailed in facility written procedures. Team members are strictly prohibited from alerting other team members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility.

	The facility provided Housing Unit Logs demonstrating “Area Tours” are completed by the PREA Compliance Managers, Sergeants, and Lieutenants who document the date, time and their initials for each area check at least once per shift, per day. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.14	**Youthful inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ Interviews: 1. Administrative Program Officer / PREA Compliance Manager The interview with the PREA Compliance Manager demonstrated youthful inmates are not housed at the facility. The facility houses only adult inmates; therefore, there are no youthful inmates who require separation from the adult inmate population in accordance with this standard. Site Observation: The facility tour, formal and informal interviews with the PREA Compliance Manager and the Warden demonstrated youthful inmates were not housed at the facility. (a) The Nebraska State Penitentiary PAQ states the facility does not house youthful inmates. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.15	**Limits to cross-gender viewing and searches**

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Nebraska State Penitentiary PAQ

2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025

3. Nebraska Department of Correctional Services Staff Training Academy Course Outline: Searches (Pre-Service), dated 12.31.2024

4. Post Audit: PREA Refresher Training Documentation

5. Post Audit: Memorandum, RE: PREA Standard 115.15 Limit to Cross Gender Viewing and Searches, dated 10.30.2026

Interviews:

1. Random Incarcerated Individuals

2. Targeted Incarcerated Individuals

3. Corporals

4. Captain / PREA Coordinator

Interviews with incarcerated individuals demonstrated that cross-gender announcements were not consistently made when female staff entered the housing units. Incarcerated individuals reported hearing announcements at the beginning of shifts but indicated that announcements were not consistently made each time female staff entered the units. Additionally, 100% of incarcerated individuals interviewed reported that staff conducted searches in a respectful manner.

Interviews with Corporals demonstrated that pat searches are generally conducted by same-gender staff. Female staff receive training to conduct pat searches on male incarcerated individuals and complete searches on approved transgender incarcerated individuals. The Corporals further indicated that any cross-gender searches are documented on the facility's pat search sheet. Staff of both genders acknowledged that they attempt to make cross-gender announcements each time they enter a housing unit.

The interview with the PREA Coordinator demonstrated that the agency's current practice for searching transgender Incarcerated Individuals is to assign staff of the

same gender as indicated on the individual's driver's license and birth certificate.

Site Observation:

Interviews of staff and Incarcerated Individuals demonstrated cross-gender announcements were not consistently made when female staff entered housing units. In Housing Unit 6, the shower area was visible from the housing unit entrance, creating the potential for cross-gender viewing of Incarcerated Individuals while showering. Additionally, toilets within the gym bathroom were not adequately screened from areas routinely accessed by female staff, creating the potential for cross-gender viewing of Incarcerated Individuals while performing bodily functions.

Corrective Action Plan:

Review and reinforce facility procedures requiring female staff to announce their presence when entering housing units, consistent with the requirements of §115.15.
Address visibility into the Housing Unit 6 shower area to ensure Incarcerated Individuals are able to shower without being viewed by opposite-gender staff except in exigent circumstances or when such viewing is incidental to routine cell checks.
Implement appropriate privacy measures within the gym bathroom to prevent female staff from viewing Incarcerated Individuals while using the toilet, while maintaining necessary safety and security supervision.
Provide documented training to applicable staff regarding cross-gender announcement and viewing requirements and any revised facility practices implemented as corrective action.
Appropriate facility personnel shall provide a memorandum outlining the sustainable action plan and identifying the designated position responsible for ongoing oversight to ensure the requirements of §115.15 are consistently implemented and maintained. The memorandum shall be addressed to the DOJ PREA Auditor and include the date, author, and applicable standard.
Upload the memorandum, training documentation, photographs or other evidence of physical-plant modifications, and all supporting documentation to the corresponding provision within the Online Audit System.

Post audit, the facility provided PREA refresher training records and shift logs demonstrating that applicable staff received additional training on cross-gender announcements and cross-gender viewing requirements.

Post audit, the agency PREA Coordinator provided a memorandum addressed to the DOJ PREA Auditor outlining the temporary and permanent corrective measures to ensure incarcerated individual privacy while showering.

	(a) Nebraska State Penitentiary PAQ states the facility does not conduct cross-gender strip or cross-gender visual body cavity searches of their Inmates. In the past 12 months zero cross-gender strip or cross-gender visual body cavity searches of inmates. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 8-9, section E. 1., states, “Team members shall not conduct cross-gender safety searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners. All cross-gender safety searches and cross-gender visual body cavity searches will be documented in an Incident Report. The report shall be maintained by the facility PREA compliance manager.” The facility provided a Nebraska Department of Correctional Services Staff Training Academy Course Outline: Searches (Pre-Service). The course description states, “An introduction to the contraband found in a correctional facility and the utilization of various searches to control it. The key elements of the pat, safety, room, and area will be discussed, and practical exercises will be conducted on pat and room searches. Professional conduct during searches will be emphasized throughout the course.” (b) Nebraska State Penitentiary PAQ states this standard is not applicable as females are not housed at the Nebraska State Penitentiary. (c) Nebraska State Penitentiary PAQ states the facility policy requires that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches be documented and justified. Policy compliance can be found in provision (a) of this standard. (d) Nebraska State Penitentiary PAQ states the facility has implemented policies and procedures that enable Inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera). Policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 9, section E. 3., states, “In order to enable incarcerated individuals to shower,

perform bodily functions and change clothing without nonmedical team members of the opposite gender viewing their breasts, buttocks or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks, all team members of the opposite gender will announce their presence when entering an incarcerated individual housing unit. Written notice to incarcerated individuals shall be posted prominently in all units indicating team members of the opposite gender may be present at any time.

It is also necessary to make a verbal announcement when a team member of the opposite gender is assigned to work on an incarcerated individual housing unit or when a team member of the opposite gender enters an incarcerated individual housing unit where incarcerated individual sleeping/showering quarters are located. For example, if a female team member is assigned to a male housing unit for the duration of a shift, an announcement at the beginning of the shift is required regarding to that person's presence. When the female leaves the unit and returns an announcement of a female present must be made upon return to the unit. In addition, any time an opposite gender team member who is not assigned to that unit enters an area of the housing unit where incarcerated individual sleeping/showering quarters are located, a verbal announcement of their presence must be made. The announcement shall be made in such a manner that is most likely to be heard, such as the intercom system, and shall make it clear that a team member of the opposite gender has entered the unit (appropriate language includes but is not limited to "A male/female team member is on the floor/unit."). In the event of exigent circumstances (i.e., a medical emergency, incarcerated individual altercation, incarcerated individual/team member assault, etc.) the announcement of cross gender team members is not necessary.”

(e) The Nebraska State Penitentiary PAQ states the facility has a policy prohibiting staff from searching or physically examining a transgender or intersex Inmate for the sole purpose of determining the Inmate’s genital status. Such searches did not occur in the past 12 months.

Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 9, section E. 4., states, “NDCS shall not search or physically examine a transgender or intersex incarcerated individual for the sole purpose of determining the incarcerated individual's genital status. If an incarcerated individual's genital status is unknown, it may be determined during conversations with the incarcerated individual, by reviewing medical records or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner.”

Based on the review of documentation, observations, and interviews, the facility

	meets the standard requirements.

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Language Line Services Inc Service Contract Amendment, dated 1.1.2025 – 8.16.2027 4. Nebraska Department of Correctional Services Sexual Assault Awareness Brochure in English and Spanish, dated 7.2025 5. Hotline Postings in English and Spanish Interviews: 1. Targeted Incarcerated Individuals 2. Unit Manager 3. Deputy Director of Prison Operations Interviews with targeted incarcerated individuals, including two with limited English proficiency (LEP), five with cognitive disabilities, one who was hard of hearing and wore glasses, and one who was blind in one eye, demonstrated that all individuals were aware of the agency's zero-tolerance policy and available methods for reporting allegations of sexual abuse and sexual harassment. Incarcerated individuals identified multiple reporting options, including the reporting hotline, written communications through kites, third-party reporting, anonymous reporting, and the grievance process available through their tablets. Individuals also indicated that their tablets provided opportunities to communicate with family, friends, and case managers. The interview with the Unit Manager demonstrated that PREA education and reporting information are provided in a manner intended to accommodate the individual needs and comprehension levels of incarcerated individuals. The Unit Manager explained

	that he reads and reviews relevant portions of the PREA policy, reporting procedures, and incarcerated individuals' rights, providing additional explanations and asking clarifying questions to assess understanding. Risk screening questions are administered before PREA education, allowing staff to identify individuals who may require additional assistance due to cognitive or comprehension limitations. When additional assistance is necessary, staff adapt the information to the individual's level of understanding and repeat the education as often as needed, including multiple times within a 24-hour period. For incarcerated individuals with limited English proficiency, staff utilize Language Line or agency-approved interpreters to facilitate communication and ensure comprehension. The Unit Manager further indicated that sign language interpretation services are available for incarcerated individuals who are deaf or hard of hearing. The interview with the Deputy Director of Prisons Operations demonstrated that agency procedures include access to Language Line services and accommodations designed to ensure Incarcerated Individuals with cognitive, disability-related, or language needs understand PREA requirements and available reporting mechanisms. The Deputy Director described the use of audio, video, and written materials, as appropriate, to support comprehension of procedures for reporting sexual abuse, sexual harassment, and retaliation. Site Observation: Site observations demonstrated that newly revised agency PREA informational postings were consistently displayed throughout the facility. The postings included information regarding the agency's zero-tolerance policy, available reporting options, and incarcerated individuals' rights. The materials were presented in both English and Spanish, using sufficiently large print and placement at accessible heights to promote visibility and readability for incarcerated individuals. (a) The Nebraska State Penitentiary PAQ states the agency has established procedures to provide disabled inmates equal opportunities to be provided with and learn about the agency’s efforts to prevent, detect and respond to sexual abuse and sexual harassment. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 10, section F. 1., states, “Information will be provided in formats accessible to all incarcerated individuals, including those who are deaf or hard of hearing, visually impaired or otherwise disabled; those who have intellectual, psychiatric or speech disabilities; as well as to incarcerated individuals who have limited reading skills and who are limited English proficient.”

The facility provided a Nebraska Department of Correctional Services Sexual Assault Awareness Brochure in English and Spanish. The brochure includes the following information.

· Nebraska Department of Correctional Services Zero Tolerance Policy

· Incarcerated individual on Incarcerated individual or Team member on Incarcerated individual Sexual Behavior

· If you are sexually assaulted

· Self Protection

· Nebraska State Statute

The facility provided Hotline Postings in English and Spanish providing the following information.

· Reports can be made anonymously.

· Report to any staff, volunteer, contractor, medical or mental health staff.

· Report to the PREA coordinator or PREA compliance manager.

· Call the Ombudsman’s office 01#

· You can tell a Family member, friend, legal counsel, or anyone else outside the facility, and they can report on your behalf by calling (855) 623-7360.

· You can call the PREA hotline PIN:0-111-111-111 speed dial 08#

(b) The Nebraska State Penitentiary PAQ states the agency has established procedures to provide inmates with limited English equal opportunity to participate in or benefit from all aspects of the agency’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Policy compliance can be found in provision (a) of this standard.

(c) The Nebraska State Penitentiary PAQ states the agency prohibits the use of inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations. In the last 12 months the facility has had zero instances where inmates were used for interpreters.

	Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 10, section F. 2., states, “Reasonable steps will be taken to ensure meaningful access to information is provided to incarcerated individuals who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately and impartially, both receptively and expressively, using any necessary specialized vocabulary. Reliance will not be placed on incarcerated individual interpreters, incarcerated individual readers or other types of incarcerated individual assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the incarcerated individual's safety.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.17	**Hiring and promotion decisions**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Nebraska Department of Correctional Services, Teletype Operations Policy 010.06, dated 6.30.2025 4. Nebraska Department of Correctional Services, Team Member Selection Policy 112.03, dated 5.31.2025 5. Nebraska Department of Correctional Services Personal Information for Security Check, dated 4.2023 6. Reference Check Form, dated 11.2013 Interviews: 1. Human Resource Manager The interview with the Human Resources Manager demonstrated that all employees and contractors complete administrative adjudication questions during the hiring

process. The agency conducts criminal background checks upon initial employment, during the promotion process, and at least every five years thereafter. The Human Resources Manager explained that the Central Human Resources Office provides the facility with monthly reports to monitor compliance with background check requirements and ensure that checks are completed within the required five-year timeframe. The Human Resources Manager further indicated that the facility conducts institutional reference checks for applicable applicants, while the Agency PREA Coordinator is responsible for completing incoming institutional reference checks.

Site Observation:

The review of documentation using the PREA Audit Adult Prisons and Jails Documentation Review Employee File/Records template demonstrated that all 24 employee files reviewed (100%) contained documentation of criminal background checks completed upon hire and at least every five years thereafter. The facility further demonstrated that administrative adjudication questions were addressed during the hiring and promotion processes and that institutional reference checks were requested and completed for applicable applicants. Additionally, the review of two contractor files and two volunteer files demonstrated that criminal background checks were completed in 2025 and 2026, and contractors completed the required administrative adjudication questions.

(a) The Nebraska State Penitentiary PAQ states the agency policy prohibits hiring or promoting anyone who may have contact with inmates and prohibits enlisting the services of any contractor who may have contact with inmates who: (1) Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997); (2) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.

Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 11, section G., states, “NDCS shall not hire, promote or enlist the services of any contractor who may have contact with incarcerated individuals who has engaged in sexual/assault in a prison, jail, lockup, community confinement facility, juvenile facility or other institution; who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, coercion or if the victim did not consent or was unable to consent; and/or who has been civilly or administratively adjudicated to have engaged in such activity. Any incidents of sexual harassment will be taken into consideration. Refer to Policy 112.03 Team Member Selection Policy, for additional details regarding the

	hiring and promoting processes.” (b) The Nebraska State Penitentiary PAQ states agency policy requires the consideration of any incidents of sexual harassment when determining to hire and or promote anyone, or to enlist services of any contractor, who may have contact with inmates. Policy compliance can be found in provision (a) of this standard. (c/f/h) The Nebraska State Penitentiary PAQ states agency policy requires that before it hires any new employees who may have contact with inmates, it (a) conducts criminal background record checks, and (b) consistent with federal, state, and local law, makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. In the past 12 months, the number of persons hired who may have contact with inmates who have had criminal background record checks was 128. Nebraska Department of Correctional Services, Teletype Operations Policy 010.06, page 7, section XX Background Checks, states, “All persons entering NDCS facilities, including any team member/volunteer/contractor or visitor are subject to a background investigation including but not limited to Criminal History Check Log (Attachment D), driving record, and wanted person files. In addition, inquiries may include checking intelligence files, NCJIS, incarcerated individual telephone and visiting records, and conducting follow-up interviews. All teletype inquiries related to team members, contractors, volunteers and incarcerated individual visitors will be divided as follows: The Special Services Unit will conduct background checks for all team members, contractors, interns, and volunteers for NDCS. OCC will conduct background checks for incarcerated individual visitors for OCC, Community Corrections Center Omaha (CCC-O), and the Nebraska Correctional Youth Facility (NCYF). RTC will conduct background checks for incarcerated individual visitors for RTC. NSP will conduct background checks for incarcerated individual visitors for NSP, Community Corrections Center-Lincoln (CCCL), and Nebraska Correctional Center for Women (NCCW). TSCI will conduct background checks for incarcerated individual visitors at TSCI. McCook Police Department will conduct background checks for incarcerated individual visitors for the Work Ethic Camp (WEC).” (d) The Nebraska State Penitentiary PAQ states the agency policy requires that a criminal background records check be completed before enlisting the services of any contractor who may have contact with inmates. In the past 12 months there was two

	contract for services where criminal background record checks were conducted on all contractors covered in the contract who might have contact with inmates. Policy compliance can be found in provision (a) of this standard. (e) The Nebraska State Penitentiary PAQ states the agency requires background checks to be completed every five years. Nebraska Department of Correctional Services, Team Member Selection Policy 112.03, page 14, section II, 4., states, “NDCS will conduct security checks of current team members every five years.” (g) The Nebraska State Penitentiary PAQ states that agency policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination. Nebraska Department of Correctional Services, Team Member Selection Policy 112.03, page 14, section 3. d., states, “Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.18	**Upgrades to facilities and technologies**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ Interviews: 1. Associate Warden 2. Deputy Director of Prisons Operations

	The interview with the Associate Warden demonstrated that the facility has expanded its video monitoring capabilities since the previous PREA audit through the installation of additional surveillance cameras in several areas. These improvements included cameras in restroom areas with appropriate privacy masking to prevent viewing incarcerated individuals during personal activities. Additional cameras were installed in Housing Unit 6 following the reopening of a previously unoccupied sleeping bay, which now houses more than 100 incarcerated individuals. The Associate Warden further indicated that surveillance coverage was expanded in the basement recreational areas and outdoor yard to enhance supervision, improve visibility, and reduce potential blind spots. The interview with the Deputy Director of Prisons Operations demonstrated vulnerable inmates are housed where each can be observed under cameras, near monitoring stations and ensuring staffing patterns appropriate for supervision and technology enhances supervision. (a) The Nebraska State Penitentiary PAQ states the facility has acquired a new facility or made substantial expansions or modifications to existing facilities since the last PREA audit. (b) The Nebraska State Penitentiary PAQ states the facility has installed electronic surveillance system since the last PREA audit. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.21	**Evidence protocol and forensic medical examinations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Facility checklist for Incidents of Sexual Assault Sexual Abuse and Sexual Harassment, dated 3.2025

4. Nebraska Sexual Assault Protocol, dated 2019

5. Nebraska Statute 81-1429.03.

6. Advocacy Attempt Memorandum, dated 7.8.2026

7. Nebraska Department of Correctional Services, Correctional Investigators' Duties and Reporting of Criminal Activities Policy 215.01, dated 12.31.2025

Interviews:

1. Nurse Administrator

The interview with the Nurse Administrator demonstrated that incarcerated individuals who report allegations of sexual abuse are transported to Bryan Medical Center for forensic medical examinations when indicated. The Nurse Administrator identified Bryan Medical Center as the designated outside medical facility where incarcerated individuals can receive forensic examination services following an allegation of sexual abuse.

Site Observations:

Site observations and the information instigation review demonstrated that no forensic medical examinations were conducted during the preceding 12-month review period.

(a) The Nebraska State Penitentiary PAQ states the facility is responsible for conducting administrative sexual abuse investigations (including inmate-on-inmate sexual abuse or staff sexual misconduct). The agency/facility is not responsible for conducting criminal sexual abuse investigations (including inmate-on-inmate sexual abuse or staff sexual misconduct). If another agency has responsibility for conducting either administrative or criminal sexual abuse investigations, the name of the agency that has responsibility is the Nebraska State Patrol.

The facility provided a Facility Checklist for incidents of sexual assault, sexual abuse, and sexual harassment. The checklist documents the following information.

· Date and time reported

· Date and time of incident

· Allegation Category

· Alleged Victim-Name / Number

· Alleged Perpetrator-Name/Number

· Witnesses of the Incident – Name and Number

· First Team Member(s) on Scene (with title)

· Means of Discovery/Reporting

Section A: Steps to ensure a coordinated response for sexual assault/abuse

Section B: If incident is Sexual Assault

Section C: Before the end of shift, Shift Supervisors must also ensure the following is complete

· Form completed by: Name/title/signature

· Compliance Manager Reviewed: Signature / Date / Time

(b) The Nebraska State Penitentiary PAQ states the protocol is developmentally appropriate for youth. The protocol was adapted from or otherwise based on the most recent edition of the DOJ's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011.

The facility provided a Nebraska Medical Sexual Assault Protocol, Nebraska Attorney General’s Office. The protocol speaks to the following information.

· Definitions

· Nebraska Statutes Relating to Sexual Assault

· Statute of Limitations

· Trauma Informed Care

· Nebraska Sexual Assault Kit and Reimbursement

· Evidence Collection Steps

(c) The Nebraska State Penitentiary PAQ states the facility offers all inmates who experience sexual abuse access to forensic medical examinations. Forensic examinations are offered at no cost to the victim. Where possible, all examinations are conducted by SAFE or SANE examiners. The number of forensic exams conducted during the past 12 months is zero.

	The facility provided the Nebraska Statute 81-1429.03, which states, “The full out-of-pocket cost or expense that may be charged to a sexual assault victim in connection with a forensic medical examination shall be paid from the Sexual Assault Payment Program Cash Fund. A report of a forensic medical examination shall not be remitted to the patient or his or her insurance for payment.” (d) The Nebraska State Penitentiary PAQ states the facility attempts to make a victim advocate from a rape crisis center available to the victim, in person or by other means. All efforts are documented. If a rape crisis center is not available to provide victim advocate services, the facility provides a qualified staff or community member. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 11, section I., states, “A forensic examination shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. This person shall be an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual assault and forensic examination issues in general. The facility will document efforts to provide SAFEs or SANEs on the Facility Checklist for Incidents of Sexual Assault/Abuse(Attachment E). In the event that an incarcerated individual is sent to the community hospital for a SANE examination, the facility shift supervisor will ask the incarcerated individual if they would like a victim advocate present at the hospital for support through the SANE examination. If the incarcerated individual indicates that they would like a victim advocate present, the facility shift supervisor will notify the hospital that a victim advocate was requested and will document on the Facility Checklist for Incidents of Sexual Assault/Abuse (Attachment E). The hospital will contact an advocate from a rape crisis center to be present. If an advocate is not available to provide victim advocate services, the facility shall make available a qualified individual from a community-based organization or qualified agency team member. This person shall be an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual abuse/assault and forensic examination issues in general. As requested by the victim, the victim advocate, qualified agency team member or qualified community-based organization staff member shall accompany and support the victim through the forensic examination process and investigatory interviews and shall provide emotional support, crisis intervention information and referrals.

	If requested by the victim, he or she will be allowed to contact his or her emergency contact or an immediate family member via a team member assisted telephone call. The team member assisted call shall be no longer than 15 minutes in duration. Team members will document the call, or attempted call, on an Incident Report." The facility provided documentation of advocacy outreach efforts demonstrating the agency has made ongoing attempts to establish advocacy services through Advocacy and Government Affairs. These efforts demonstrate the agency's continued attempt to secure access to outside advocacy services for inmates. (e) The Nebraska State Penitentiary PAQ states a qualified staff or community member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information and referrals. (f-h) The Nebraska State Penitentiary PAQ states the agency is not responsible for investigating administrative or criminal allegations of sexual abuse and relies on another agency to conduct these investigations, the agency has requested that the responsible agency follow the requirements of paragraphs §115.21 (a) through (e) of the standards. Nebraska Department of Correctional Services, Correctional Investigators' Duties and Reporting of Criminal Activities Policy 215.01, page 2, section I. D., states, "Criminal investigators have authority to conduct investigations into alleged acts by or involving an incarcerated individual, staff member or contractors and volunteers of the Nebraska Department of Correctional Services, potentially constituting misdemeanors or felonies if the alleged act occurred in an NDCS facility/building site/ property." Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.22	**Policies to ensure referrals of allegations for investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 Interviews: 1. Unit Manager / Investigator The interview with the Investigator demonstrated that all allegations of sexual abuse and sexual harassment are taken seriously and investigated regardless of the source of the report or the manner in which the allegation is received. The Investigator emphasized that allegations are addressed through the investigative process regardless of whether they involve sexual abuse or sexual harassment, ensuring that reports are not dismissed based on their source or the type of allegation. Site Observations: Site observations and the review of investigative documentation demonstrated that the facility received 18 allegations during the preceding 12-month review period, including seven allegations of sexual harassment and 11 allegations of sexual abuse. Of these allegations, six investigations remained open at the time of the onsite audit, and documentation associated with the remaining 12 investigations was reviewed during the onsite review. None of the allegations required referral to law enforcement. (a) The Nebraska State Penitentiary PAQ states the agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including inmate-on-inmate sexual abuse and staff sexual misconduct). In the past 12 months the facility has had 18 allegations of sexual abuse and sexual harassment that were received. In the past 12 months, the number of allegations resulting in an administrative investigation was 18. In the past 12 months, the number of allegations referred for criminal investigation was zero. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 12, states, “NDCS shall ensure that an administrative or criminal investigation is completed for all allegations of sexual assault/abuse and sexual harassment, including third party and anonymous reports, in a prompt, thorough and objective manner. Any outside entities responsible for conducting administrative or criminal investigations of sexual assault/abuse and sexual harassment shall have in place a policy governing the conduct of such investigations that complies with PREA standards and shall provide training pertaining to the investigation of sexual assault/

	abuse and sexual harassment in confinement settings to the NDCS criminal investigators and administrative investigators who conduct such investigations. When outside agencies investigate sexual assault/abuse and sexual harassment, NDCS shall cooperate with outside investigators and endeavor to remain informed about the progress of the investigation. (This provision is also listed in PREA Standard 115.71) Upon receipt of an allegation for sexual assault, sexual abuse or sexual harassment, the captain/PREA coordinator will review the report(s) of the allegation and discuss the incident with the facility warden to determine if an investigation is warranted. If it is determined to open an investigation, the captain/PREA coordinator will assign the investigation a case number in the Investigator's Case Management database and forward the case log and initial reports to the PREA compliance manager at the respective facility to be assigned to a PREA investigator.” (b-c) The Nebraska State Penitentiary PAQ states the agency has policy that requires allegations of sexual abuse or harassment to be referred for investigation to an agency with the legal authority to conduct criminal investigations. (d) The Nebraska State Penitentiary PAQ states if the agency is responsible for conducting administrative or criminal investigations of alleged sexual abuse, and another state entity has that responsibility, this other entity has a policy governing how such investigations are conducted is not applicable. The agency policy is available on the agency website at: Prison Rape Elimination Act | Nebraska Department of Correctional Services (NDCS) Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.31	**Employee training**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ

2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025

3. Nebraska Department of Correctional Services Sexual Assault/Abuse PREA PowerPoint Course Overview, dated 2025

4. Monthly PREA Refresher Trainings, dated 2023

5. PREA of 2003: Information For Those With Direct And Indirect Contact With Inmates, Training Acknowledgment, not dated

Interviews:

1. Corporals

2. Captain / PREA Coordinator

Interviews with Corporals demonstrated that staff receive annual training on the agency's zero-tolerance policy regarding sexual abuse and sexual harassment, supplemented by refresher training and discussions that may occur as frequently as monthly. All Corporals indicated that they carry first responder reference cards and demonstrated an understanding of their responsibilities when responding to allegations of sexual abuse.

The Corporals demonstrated an understanding of their roles in preventing sexual abuse and sexual harassment through active supervision, including conducting rounds, observing activity within cells, monitoring incarcerated individuals' movements, and remaining attentive to changes in behavior. Staff explained that indicators such as withdrawal, refusal to shower or eat, or other unusual behaviors would prompt them to engage the incarcerated individual, ask questions, and assess whether additional intervention or assistance was necessary.

All Corporals identified themselves as mandatory reporters and demonstrated an understanding of their responsibility to immediately report allegations or suspicions of sexual abuse or sexual harassment to their supervisors or shift supervisors. They also demonstrated an awareness of professional boundaries, emphasizing the importance of maintaining appropriate staff-incarcerated individual relationships and separating their personal lives from their professional responsibilities.

Additionally, the Corporals identified multiple reporting methods available to incarcerated individuals, including reporting directly to staff, accessing the reporting hotline through their tablets, utilizing the grievance process, and communicating with staff or family members through their tablets. Staff also recognized that incarcerated

	individuals may submit reports anonymously. The interview with the PREA Coordinator demonstrated due to a past directive from the agency Director during the time of COVID, the agency had been completing training every 18 months through 2022. This directive has been corrected and employees have returned to annual training, with monthly refresher email notifications since January of 2022. Site Observation: Through utilization of the PREA Audit Adult Prison & Jail Documentation Review Employee File / Records Review template demonstrated 24 of 24 employee training files demonstrate annual training regarding the agency zero tolerance policy and refresher training has been completed annual training had been completed in 2024, 2025 and thus far in 2026. (a) The Nebraska State Penitentiary PAQ states the agency trains all employees who may have contact with Inmates in all required provisions of this standard. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 13, section 2., states, Pre-service and in-service team member training will consist of the following and will include gender specific approaches to working with male and female incarcerated individuals: a. Zero-tolerance for sexual abuse/assault and sexual harassment. b. Fulfilling responsibilities with regard to prevention, detection, reporting and response policies and procedures for sexual abuse/assault and sexual harassment. c. Incarcerated individuals' right to be free from sexual abuse/assault and sexual harassment. d. Incarcerated individuals' and staffs' rights to be free from retaliation for reporting sexual abuse/assault and sexual harassment. e. Dynamics of sexual abuse/assault and sexual harassment in confinement. f. Common reactions of sexual abuse/assault and sexual harassment victims. g. Detecting and responding to signs of threatened and actual sexual abuse/ assault and sexual harassment. h. Avoiding inappropriate relationships with incarcerated individuals including sexual abuse/assault and sexual harassment.

	i. Communicating effectively and professionally with incarcerated individuals, including lesbian, gay, bisexual, transgender, intersex, and gender nonconforming incarcerated individuals about sexual abuse/assault and sexual harassment. j. Complying with relevant laws related to mandatory reporting of sexual abuse/ assault to outside authorities. k. Conducting cross-gender pat searches (male staff will only pat search female incarcerated individuals in exigent circumstances) and searches of transgender and intersex incarcerated individuals in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs (Pre-service and as needed). The facility provided a Nebraska Department of Correctional Services Sexual Assault/ Abuse In-Service PowerPoint. The course overview includes the following. · PREA · What is the Prison Rape Elimination Act · Who the Standards Apply To · Functions of the Law · Eighth Amendment · Prison Rape Elimination Act Enacted · Impact to the Job · Nebraska Statutes · Facility Audits · Zero Tolerance · Organizational Culture · PREA and Organizational Culture · Sexual Assault, Abuse, and Harassment · Individual Rights · Sexual Abuse – Inability to Consent · Sexual Abuse in Confinement · PREA vs Rule Violation · Correct Language

	· When an incarcerated individual wants to report · When writing an incident report · Consequences of not respecting rights · What does policy state regarding inmates' rights to be free from sexual harassment and sexual abuse · How do staff fulfill the requirement of an inmates rights to be free from sexual harassment and sexual abuse · Retaliation · Code of silence · Reporting Culture · Sexual abuse · Sexual Harassment · Dynamics of Sexual Abuse and Harassment · Detecting signs · Red Flags · Staff Sexual Misconduct Continuum · Sexual Abuse and the impact of trauma · Prevent and Detect (b) The Nebraska State Penitentiary PAQ states training is tailored to the unique needs and attributes and gender of Inmates at the facility. Employees who are reassigned from facilities housing the opposite gender are given additional training. Policy compliance can be found in provision (a) of this standard. (c) The Nebraska State Penitentiary PAQ states between trainings the agency provides employees who may have contact with inmates with refresher information about current policies regarding sexual abuse and sexual harassment. The facility completes refresher training annually. The facility provided monthly PREA refresher trainings for each month of the year, January through December. Trainings include the following topics.

	· January: PREA Basics – Dynamics of Sexual Abuse in Detention – Detecting Signs of Sexual Abuse · February: Handling Disclosures of Abuse – Responding to Victimized Incarcerated Individuals · March: Professional Communication and Boundaries – Appropriate Interactions – Compromised Professionalism · April: Inmate Privacy – Pat and Safety Searches · May: Ways Incarcerated Individuals Can Report · June: Helping Inmates Who Primarily Speak Another Language · July: Duty to Report: Knowledge, Suspicion, or Information · August: First Responder Duties · September: Encouraging Inmates to Report Sexual Abuse · October: Completing an Incident Report · November: Investigations · December: Zero Tolerance Policy (d) The Nebraska State Penitentiary PAQ states the agency documents that employees who may have contact with Inmates, understand the training they have received through employee signature or electronic verification. The facility provided PREA of 2003: Information for those with Direct and Indirect Contact with Inmates, which states, “I acknowledge that I have been trained on and understand the Prison Rape Elimination Act, NDCS policy and procedures and the Department's zero tolerance standard for all forms of sexual abuse. I also acknowledge that I will report any findings of sexual abuse immediately.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.32	**Volunteer and contractor training**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Nebraska Department of Correctional Services, Community Partner Orientation Training PowerPoint, 7.2026 4. Nebraska Department of Correctional Services, Volunteer Orientation Handbook, dated 6.2024 5. PREA of 2003: Information For Those With Direct And Indirect Contact With Inmates, Training Acknowledgment, not dated Interviews: 1. Dental Assistant – Contractor 2. Mental Health Provider / Social Worker - Contractor 3. Volunteer – Religious Services 4. Volunteer – Second Chance Pups Interviews with two contractors, including a Dental Assistant and a Licensed Independent Social Worker providing mental health services, demonstrated that both received education regarding the agency's zero-tolerance policy before having contact with incarcerated individuals. Both contractors indicated that PREA informational materials and reporting instructions are consistently displayed throughout the facility and remain accessible for reference. The contractors demonstrated an understanding of their reporting responsibilities, explaining that allegations or suspicions of sexual abuse or sexual harassment must be documented in an incident report and submitted directly to their supervisors. Interviews with two volunteers, including a religious volunteer and a volunteer who facilitates Second Chance programming for pets, demonstrated that both received PREA education from facility personnel and understood the agency's zero-tolerance policy. The volunteers expressed a strong commitment to sexual safety and indicated that facility personnel provide ongoing support and guidance regarding PREA responsibilities. Both reported receiving training consistent with that provided to employees and demonstrated an understanding of their obligation to immediately report allegations or concerns to the Religious Coordinator or the staff member responsible for overseeing the volunteer program, as applicable.

Site Observation:

Utilization of the PREA Audit Adult Prison & Jail Documentation Review Employee File / Records Review template demonstrated both contractor and volunteers had completed training on the agency zero tolerance policy in 2025 and 2026.

(a) The Nebraska State Penitentiary PAQ states all volunteers and contractors who have contact with Inmates have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and harassment prevention, detection, and response. There are a total of 15 medical and mental health contract staff and 453 volunteers who have contact with Inmates, have completed the required training.

The facility provided a Nebraska Department of Correctional Services, Community Partner Orientation Training PowerPoint with the following training components.

Chapter 15

· Federal PREA Standard 115.232 volunteer training

· Sexual Assault on Incarcerated people

· Prohibited Behaviors

· Your Responsibilities

The facility provided a Nebraska Department of Correctional Services, Volunteer Orientation Handbook. Chapter 14 provides information regarding Sexual Assault on Incarcerated Individuals.

(b) The Nebraska State Penitentiary PAQ states the level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates. All volunteers and contractors who have contact with inmates have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

(c) The Nebraska State Penitentiary PAQ states the agency maintains documentation confirming that the volunteers and contractors understand the training they have received.

The facility provided PREA of 2003: Information for those with Direct and Indirect

	Contact with Inmates, which states, “I acknowledge that I have been trained on and understand the Prison Rape Elimination Act, NDCS policy and procedures and the Department's zero tolerance standard for all forms of sexual abuse. I also acknowledge that I will report any findings of sexual abuse immediately.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.33	**Inmate education**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Prison Rape Elimination Act (PREA) Inmate Orientation, dated 7.2023 4. PREA Poster Interviews: 1. Random Incarcerated Individuals 2. Targeted Incarcerated Individuals 3. Unit Manager Interviews with incarcerated individuals who elected to respond to all interview questions demonstrated that each was knowledgeable about the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and understood the available reporting methods. Incarcerated individuals identified multiple reporting options, including speaking directly with staff, submitting grievances through their tablets, contacting friends or family members, calling the Ombudsman and accessing the reporting hotline. They also demonstrated an understanding that allegations could be reported anonymously, regardless of the reporting method utilized. All incarcerated individuals interviewed who were identified as having limited English proficiency (LEP) indicated that they received PREA education in Spanish,

demonstrating the facility's efforts to provide information in a language they could understand.

Site Observation:

Utilization of the PREA Audit Adult Prison & Jail Documentation Review Inmate File / Records Review template demonstrated that 22 of the 40 incarcerated individuals interviewed had been admitted to the facility during the preceding 12-month review period. Of those 22 individuals, 21 had documentation confirming completion of PREA education during the orientation process. The remaining incarcerated individual also received PREA education during orientation but declined to sign the acknowledgment form. Therefore, the review demonstrated that all 22 incarcerated individuals (100%) received PREA education during the orientation process.

(a) The Nebraska State Penitentiary PAQ states Inmate receives information at time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. The number of inmates admitted in the past 12 months who were given this information at intake was 2400.

Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 14, section M. 1-4 states,

1. “During the intake process at all NDCS facilities, incarcerated individuals shall receive information explaining NDCS' zero tolerance policy regarding sexual abuse/ assault, sexual harassment, and retaliation for reporting such incidents; how to report incidents or suspicions of sexual abuse/assault, sexual harassment, and retaliation for reporting such incidents; and informed of the designated facility PREA compliance manager. See Inmate Orientation Information Regarding Sexual Assault Awareness (Attachment B). (ACI-3O-09)

2. Within 30 days of intake, incarcerated individuals newly assigned to NDCS shall receive comprehensive education through use of a PowerPoint/video presentation, with staff available to answer questions, regarding their right to be free from sexual assault/abuse and sexual harassment, their right to be free from retaliation for reporting such incidents and agency policies and procedures for responding to and reporting such incidents.

3. Information will be provided in formats accessible to all incarcerated individuals, including those who are deaf or hard of hearing, visually impaired or otherwise disabled; those who have intellectual, psychiatric or speech disabilities; as well as to incarcerated individuals who have limited reading skills and who are limited English proficient. (ACI-3O-09)

4. Upon transfer to any facility, information specific to that facility's procedures, to

	the extent that they differ from the previous facility, shall be provided to the incarcerated individual. 5. Receipt of information at intake and comprehensive education within 30 days and upon transfer to any facility shall be documented through incarcerated individual signature and maintained in the inmate file. 6. In addition to providing such education, NDCS shall ensure key information is continuously and readily available or visible to incarcerated individuals through posters, inmate handbooks or other written formats." (b) The Nebraska State Penitentiary PAQ states the number of those inmates admitted during the past 12 months (whose length of stay in the facility was for 30 days or more) who received comprehensive education on their rights to be free from both sexual abuse and sexual harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents within 30 days of intake was 2073. Policy compliance can be found in provision (a) of this standard. (c) The Nebraska State Penitentiary PAQ states of those who were not educated during 30 days of intake, all inmates have been subsequently educated. Agency policy requires that inmates who are transferred from one facility to another be educated regarding their rights to be free from both sexual abuse and sexual harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents, to the extent that the policies and procedures of the new facility differ from those of the previous facility. Policy compliance can be found in provision (a) of this standard. The facility provided a Prison Rape Elimination Act (PREA) Inmate Orientation demonstrating Incarcerated Individuals are educated on the agency zero tolerance policy, how to report allegations of sexual harassment and sexual abuse internally and externally and information on their rights. (d) The Nebraska State Penitentiary PAQ states Inmate PREA education is available in accessible formats for all inmates including those who are limited English proficient, deaf, visually impaired, otherwise disabled or have limited reading skills. (e) The Nebraska State Penitentiary PAQ states the facility maintains documentation of inmate participation in PREA education sessions. Documentation can be found in provision (d) of this standard.

	The facility provided a PREA Inmate Orientation acknowledgements in English and Spanish. Inmates attest to the following through their signature and date. “I acknowledge that I have received information regarding my rights to be free from sexual assault, sexual abuse, sexual harassment and to be from retaliation for reporting such incidents. I have also been informed of the Nebraska Department of Correctional Services policy and procedures for responding to such incidents.” (f) The Nebraska State Penitentiary PAQ states the agency ensures that key information about the agency’s PREA policies is continuously and readily available or visible through posters, inmate handbooks, or other written formats. The facility provided a PREA posting with internal and external reporting information. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.34	**Specialized training: Investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Specialized Investigative Training: PREA Investigating Sexual Abuse in a Confinement Setting, PowerPoint Presentation, not dated 4. Nebraska Department of Correctional Services, Certificates of Completion, PREA Investigator Training Report Interviews: 1. Unit Manager / Investigator The interview with the Investigator demonstrated that specialized training for

	conducting investigations of sexual abuse in confinement settings was provided through an investigative training PowerPoint presentation provided by the Agency PREA Coordinator. The Investigator confirmed receiving the specialized training as part of the agency's preparation for conducting PREA-related investigations. Site Observations: During the pre-audit phase, training transcripts for the facility's investigators were uploaded to the Online Audit System (OAS) for review. The documentation included Nebraska Department of Correctional Services PREA investigator training records, demonstrating that specialized investigative training had been documented for the facility's investigators. (a) The Nebraska State Penitentiary PAQ states the agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 15, section N. 1., states, “In addition to the general training provided to all team members, NDCS criminal and administrative investigators will receive training in conducting investigations in confinement settings, to include: a. Techniques for interviewing victims of sexual assault/abuse. b. Proper use of Miranda and Garrity warnings. c. Sexual assault/abuse evidence collection in confinement settings. d. Criteria and evidence required to substantiate a case for administrative action or prosecution referral.” (b) The facility provided a Specialized Investigative Training: PREA Investigating Sexual Abuse in a Confinement Setting. The course overview includes the following. · Background of PREA · Investigation basics · Working with victims · Trauma informed approach · Interviewing

	· False Reports · Culture · Practical exercise (c) The Nebraska State Penitentiary PAQ states the agency shall maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. The facility has 12 employees who have completed investigator training. The facility provided a Nebraska Department of Correctional Services PREA Investigator Training Report, demonstrating each of the facility's investigators completed specialized training for investigators. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.35	**Specialized training: Medical and mental health care**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 1. 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 2. National PREA Resource Center Specialized Training: PREA Medical and Mental Care Standards Notification of Curriculum Utilization, dated 12.2013 3. National PREA Resource Center, Specialized Medical and Mental Health Training Report Interviews: 1. Nurse Administrator 2. Behavioral Health Practitioner

	Interviews with medical and mental health practitioners demonstrated that each had completed specialized training through the State of Nebraska's established training curriculum addressing the responsibilities of medical and mental health professionals in responding to sexual abuse in confinement settings. The practitioners confirmed receiving training specific to their professional roles and responsibilities when providing services to incarcerated individuals who have experienced sexual abuse. Site Observations: During the pre-audit phase, specialized training records for medical and mental health practitioners were uploaded to the Online Audit System (OAS) for review. The documentation included the National PREA Resource Center Specialized Medical and Mental Health Training Report, which demonstrated completion of the required specialized training by the facility's medical and mental health practitioners. (a) The Nebraska State Penitentiary PAQ states the agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. The number of all medical and mental health care practitioners who work regularly at this facility who received the training required by agency policy is 35. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 14, section O. 1., states, “All full and part-time medical and mental health care practitioners to include contracted staff will receive training in the following: a. Detecting and assessing signs of sexual assault/abuse and sexual harassment. b. Preserving physical evidence of sexual assault/abuse. c. Responding effectively and professionally to victims of sexual assault/abuse and sexual harassment. d. Reporting allegations or suspicions of sexual assault/abuse and sexual harassment.” The facility provided the National PREA Resource Center Specialized Training: PREA Medical and Mental Care Standards Notification of Curriculum Utilization curriculum. The curriculum demonstrates the following modules are trained to facility practitioners. · Module 1: Detecting and Assessing Signs of Sexual Abuse and Harassment · Module 2: Reporting and the PREA Standards

	· Module 3: Effective and Professional Responses · Module 4: The Medical Forensic Examination and Forensic Evidence Preservation (b) The Nebraska State Penitentiary PAQ states their medical staff do not conduct forensic medical exams. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 14, section O. 1-2 state, 1. All full and part-time medical and mental health care practitioners to include contracted staff will receive training in the following: a. Detecting and assessing signs of sexual assault/abuse and sexual harassment. b. Preserving physical evidence of sexual assault/abuse. c. Responding effectively and professionally to victims of sexual assault/abuse and sexual harassment. d. Reporting allegations or suspicions of sexual assault/abuse and sexual harassment. 2. NDCS shall maintain documentation confirming medical and mental health staff have received specialized training, either through NDCS or an outside entity. This training is required to be completed as soon as practicable.” (c) The Nebraska State Penitentiary PAQ states the agency maintains documentation demonstrating 45 medical and mental health practitioners have completed the required training. The facility provided a National PREA Resource Center, Specialized Medical and Mental Health Training report demonstrating each of the facility’s medical and mental health staff have completed the required specialized training. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.41	**Screening for risk of victimization and abusiveness**
	Auditor Overall Determination: Meets Standard

	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Identification of Potential Aggressors and Victims / Survivors Policy 201.03, dated 7.31.2025 3. Nebraska Inmate Case Management System PREA Assessment Interviews: 1. Random Incarcerated Individuals 2. Targeted Incarcerated Individuals 3. Unit Manager 4. Captain / PREA Coordinator Interviews with incarcerated individuals demonstrated that they recalled participating in risk screening assessments upon admission to the facility. Individuals described being asked questions regarding prior experiences of sexual abuse, their sexual orientation and gender identity, and any concerns regarding their personal safety within the facility. Incarcerated individuals further indicated that medical and mental health services were offered regardless of whether they disclosed a history of sexual victimization or abuse. They also recalled being reassessed approximately 30 days following their admission to determine whether their circumstances or safety concerns had changed. The interview with the Unit Manager demonstrated that all incarcerated individuals receive an initial screening for risk of sexual victimization and sexual abusiveness on the day of admission, followed by a reassessment within 30 days. Additional reassessments are conducted when requested or warranted by new information, complaints, or changes in circumstances, as well as following involvement in a sexual abuse incident. The Unit Manager further indicated that transgender incarcerated individuals receive reassessments at least every six months. The Unit Manager explained that risk screening interviews are conducted in a private area within the intake department to promote confidentiality and encourage accurate disclosure. The screening process considers multiple factors, including prior sexual victimization or sexually aggressive behavior, sexual orientation and gender identity, personal safety concerns, medical and mental health needs, criminal history, physical characteristics such as size and weight, and observed body language during the

interview. The Unit Manager further demonstrated that collateral information is reviewed and considered alongside information provided directly by the incarcerated individual to support an individualized assessment of potential vulnerability or abusiveness.

The interview with the PREA Coordinator demonstrated only the diagnostic centers have access to the entire inmate risk assessment.

Site Observation:

Utilization of the PREA Audit Adult Prison & Jail Documentation Review Inmate File / Records Review template demonstrated 22 of 40 inmates interviewed have been admitted into the facility in the past 12 months. Of those 22 inmates, 21 had completed risk assessments within 72 hours of intake and 22 had completed risk assessments within 30 days of admission into the facility.

(a) The Nebraska State Penitentiary PAQ states the facility has a policy that requires screening, upon admission or transfer, for risk of sexual abuse victimization or sexual abusiveness toward other Inmates.

Nebraska Department of Correctional Services, Identification of Potential Aggressors and Victims / Survivors, Policy 201.3, page 2, section I., states, “All incarcerated individuals shall be assessed during an intake screening at reception facilities and upon each transfer to another facility for their risk of being sexually assaulted, sexually abused or sexually harassed by other incarcerated individuals and/or their potential to be sexually abusive or sexually harassing toward other incarcerated individuals. This screening shall take place within 72 hours of arrival at the facility and be conducted using an objective screening instrument. NDCS shall implement appropriate controls on the dissemination of this information within facilities in order to ensure sensitive information is not exploited to an incarcerated individual's detriment by staff or other incarcerated individuals.”

Nebraska Department of Correctional Services, Identification of Potential Aggressors and Victims / Survivors, Policy 201.3, page 3-4, section C., states, “The intake PREA screening assessment shall consider, at a minimum, the following criteria to assess incarcerated individuals for risk of sexual victimization: (PREA standard Secured facilities 115.41d/ Community facilities 115.241d)

1. No previous incarceration

2. A previous or current conviction for sexual assault or sexual abuse against a child included on the criminal history check.

3. States they identify as a transgender male, transgender female, intersex, or gender non-conforming.

4. States their sexual orientation is gay, lesbian, bisexual.

5. States they have been sexually assaulted, sexually abuse or sexually harassed while being incarcerated.

6. States they are fearful of being sexually assaulted, sexually abused and sexually harassed while being incarcerated.

Other factors that collectively may increase the potential for being a victim /survivor of sexual assault, sexual abuse or sexual harassment include:

1. Criminal history is of a non-violent nature.

2. Is under the age of 21 or over the age of 65

3. Is small in stature (Male is shorter than 5’ 6”, female is shorter than 5’ 2”)

4. Is small in weight (Male weighs less than 140 pounds, female weighs less than 115 pounds)

5. Has a thin build

6. Was a victim/survivor of sexual assault or sexual abuse in the community

7. Has fears for their sexual safety while being incarcerated

8. Stated sexual orientation is other

9. Stated their gender identity is other

10. How do others perceive your sexual orientation

11. Self-reports a medical, developmental, or mental health condition.

12. Self-reports a medical, developmental, or mental health condition affects their daily activity.

The initial intake PREA screening assessment shall consider prior acts of sexual assault/abuse sexual harassment and prior convictions for violent offenses, and history of prior institutional violence of sexual assault/abuse and sexual harassment as known NDCS, in assessing inmates for risk of being sexually abusive.”

(b) The Nebraska State Penitentiary PAQ states the number of inmates entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 72 hours or more) who were screened for risk of sexual victimization or risk of sexually abusing other inmates with 72 hours of their entry into the facility was 2266.

(c-e) The Nebraska State Penitentiary PAQ states the facility conducts risk assessments by using an objective screening instrument. The facility does not house inmates solely for civil immigration purposes.

The facility provided computer screen prints of the agency PREA risk assessment.

Vulnerable OPO Factors

- Committed Name
- Legal Name
- Rcvd Dt
- TRD
- Rec Cter
- Loc
- Prev ID
- VW Notifiers
- DOB
- PED
- Date of Parole
- Admission Status
- Violation Description
- Committed Cnty
- Sentence Begin Dt
- Min Sentence
- Max Sentence
- Man Min Sentence

	Add PREA Assessment: · FAC · Date & Time Received at FAC · Date and Time Screened · Reason for Assessment Criminal History Check: · Who completed the Criminal History check: Name/Date? · Has the individual been previously incarcerated? · How many times · Is the criminal history nonviolent only? · Number of convictions that are of a violent nature to include sexual violence? · How many convictions of sexual violence? · Is the current conviction sexual violence? · How many convictions of sexual violence? · Is there a convictions for sexual violence against a child? · Is there a conviction for sexual violence against an adult · NDCS history of perpetrated violence for sexual assault/abuse and or harassment (Misconduct reports) explain Inmate questions: · Have you been previously incarcerated? · How many times? · Number of convictions that are of a violent nature include sexual violence? · How may convictions for sexual violence? · How many convictions for sexual violence against a child? · How many convictions for sexual violence against an adult?

Gender/Sexuality Questions

· What is your gender Identity?

· What are your preferred pronouns?

· Do you want a separate shower time?

· What is your sexual orientation?

· How do others perceive your sexual orientation?

Physical Characteristics

· Age of individual

· Height of individual

· Weight of Individual

· Build of Individual

Sexual Abuse Survival

· Are you willing to tell me if you've ever been a survivor/victim of sexual assault or abuse?

· Are you survivor of sex assault abuse?

· Can you tell me if the sexual assault/abuse happened in: an institution/ the community?

Mental health referral completed?

Personal Fears

· Do you have any fears for your safety while incarcerated?

· What are those fears

· Inmate fears include sexual assault

Medical, Developmental or Mental Health

	· Do you believe you have any medical, developmental, or mental health conditions? · What are your medical, developmental, or mental health condition? · Does this health problem, or condition limit your daily activities? · Do you want to talk to a medical/mental health staff member regarding PREA and your safety? · Medical/mental health referral completed NICaMS provides final scores for the risk assessment to include the following. · Victimization Total · High Priority Victimization Total · Aggressor Total · High Priority Aggressor Total (f) The Nebraska State Penitentiary PAQ states the policy requires that the facility reassess each inmate's risk of victimization or abusiveness within a set time period, not to exceed 30 days after the inmate's arrival at the facility, based upon any additional, relevant information received by the facility since the intake screening. The number of inmates entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 30 days or more) who were reassessed for their risk of sexual victimization or of being sexually abusive with 30 days after their arrival at the facility based upon any additional relevant information received since intake was 2073. (g) The Nebraska State Penitentiary PAQ states the policy requires that an inmate's risk level be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. Policy compliance can be found in provision (a) of this standard. (h) The Nebraska State Penitentiary PAQ states the policy prohibits disciplining inmates for refusing to answer (or for not disclosing complete information related to) questions regarding: (a) whether or not the inmate has a mental, physical, or developmental disability; (b) whether or not the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming; (c) whether or not

	the inmate has previously experienced sexual victimization; and (d) the inmate's own perception of vulnerability. Policy can be found in provision (a) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.42	**Use of screening information**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Inmate Information Interviews: 1. Targeted Incarcerated Individuals 2. Unit Manager 3. Captain / PREA Coordinator Interviews with 17 targeted incarcerated individuals, including two with limited English proficiency (LEP), five with cognitive disabilities, one bisexual individual, four identified as vulnerable, one who was hard of hearing and wore glasses, two transgender individuals, one gay individual, and one who was blind in one eye, demonstrated that 100% reported feeling safe in their assigned housing units. Additionally, all individuals reported that case management staff conducted monthly check-ins to assess their well-being and determine whether they continued to feel safe in their housing assignments. These interviews demonstrated ongoing communication between case management staff and incarcerated individuals regarding their safety and housing needs. The interview with the Unit Manager demonstrated that housing assignments for vulnerable incarcerated individuals are determined through the score of their risk assessment with consideration given to appropriate cell and dormitory placements to

	minimize potential exposure to sexually aggressive individuals. Vulnerable incarcerated individuals are also provided the opportunity to shower at times separate from the general population to further support their safety and privacy. The Unit Manager indicated that Housing Unit 6, sides B and C, generally accommodate more vulnerable incarcerated individuals and those demonstrating positive institutional behavior, while Housing Units 13 and 14 may be utilized for individuals identified as more aggressive. The interview with the PREA Coordinator demonstrated that quarterly gender dysphoria meetings are conducted with facility personnel to discuss the individual needs of transgender and intersex Incarcerated Individuals entering or transferring between facilities. These meetings are intended to ensure appropriate consideration of individual housing and programming needs. The PREA Coordinator further explained that she reviews all six-month reassessments following their completion by designated facility personnel. Site Observation: Site observations and interviews with incarcerated individuals demonstrated that vulnerable populations are provided the option to shower in a private area to support their safety and privacy. Interviews further confirmed that staff conduct monthly check-ins with vulnerable incarcerated individuals to assess their well-being and continued feelings of safety within their housing assignments. These findings were consistent with information provided during interviews with specialized staff, demonstrating that the facility's reported practices were being implemented. (a) The Nebraska State Penitentiary PAQ states the facility uses information from the risk screening required by §115.341 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 16, section Q. 1., states, “Facilities will utilize information from the risk screening to inform housing, bed, work, education and program assignments with the goal of keeping those incarcerated individuals who are at high risk of being sexually victimized from those who are at high risk of being sexually abusive. The institution's physical plant, staffing levels, size, and number of programs and services, as well as activity schedules, will determine the extent to which separation is possible or contacts minimized. Computer tracking of high-risk incarcerated individuals within an institution may be utilized. Facilities will make individualized determinations about how to ensure the safety of each incarcerated individual.”

The facility provided an Inmate Information screenshot demonstrating a Risk Factors and PREA section identifies the Incarcerated Individuals risk for the following areas.

- Suicide Risk
- Violence to Inmates
- Violence to Staff
- Victim Potential
- Current PREA Sexual Violence Potential Scores Available
- Current PREA Sexual Victimization Potential Scores Available
- PREA Violence/Vitim Potential (NEW)

(b) The Nebraska State Penitentiary PAQ states the agency/facility makes individualized determinations about how to ensure the safety of each inmate. Policy compliance can be found in provision (a) of this standard.

Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. The facility demonstrated a proactive approach to utilizing risk screening information to make individualized housing assignments and implement additional safeguards for vulnerable incarcerated individuals. All 17 targeted incarcerated individuals interviewed (100%) reported feeling safe in their assigned housing units and confirmed that case management staff conduct monthly check-ins to assess their continued safety and well-being. Additionally, vulnerable incarcerated individuals are provided opportunities for private showering and housing arrangements designed to minimize contact with individuals identified as sexually aggressive. The consistency between staff interviews, incarcerated individual interviews, and site observations demonstrated that these practices are implemented throughout the facility. The ongoing assessment of individual safety needs, coupled with additional protective measures, reflects a commitment to preventing sexual victimization that extends beyond the minimum requirements of the standard.

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:

1. Nebraska State Penitentiary PAQ

2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025

3. Inmate Information

Interviews:

1. Targeted Incarcerated Individuals

2. Unit Manager

3. Captain / PREA Coordinator

Interviews with 17 targeted incarcerated individuals, including two with limited English proficiency (LEP), five with cognitive disabilities, one bisexual individual, four identified as vulnerable, one who was hard of hearing and wore glasses, two transgender individuals, one gay individual, and one who was blind in one eye, demonstrated that 100% reported feeling safe in their assigned housing units. Additionally, all individuals reported that case management staff conducted monthly check-ins to assess their well-being and determine whether they continued to feel safe in their housing assignments. These interviews demonstrated ongoing communication between case management staff and incarcerated individuals regarding their safety and housing needs.

The interview with the Unit Manager demonstrated that housing assignments for vulnerable incarcerated individuals are determined through the score of their risk assessment with consideration given to appropriate cell and dormitory placements to minimize potential exposure to sexually aggressive individuals. Vulnerable incarcerated individuals are also provided the opportunity to shower at times separate from the general population to further support their safety and privacy. The Unit Manager indicated that Housing Unit 6, sides B and C, generally accommodate more vulnerable incarcerated individuals and those demonstrating positive institutional behavior, while Housing Units 13 and 14 may be utilized for individuals identified as more aggressive.

The interview with the PREA Coordinator demonstrated that quarterly gender dysphoria meetings are conducted with facility personnel to discuss the individual needs of transgender and intersex Incarcerated Individuals entering or transferring between facilities. These meetings are intended to ensure appropriate consideration of individual housing and programming needs. The PREA Coordinator further explained that she reviews all six-month reassessments following their completion by designated facility personnel.

Site Observation:

Site observations and interviews with incarcerated individuals demonstrated that vulnerable populations are provided the option to shower in a private area to support their safety and privacy. Interviews further confirmed that staff conduct monthly check-ins with vulnerable incarcerated individuals to assess their well-being and continued feelings of safety within their housing assignments. These findings were consistent with information provided during interviews with specialized staff, demonstrating that the facility's reported practices were being implemented.

(a) The Nebraska State Penitentiary PAQ states the facility uses information from the risk screening required by §115.341 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.

Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 16, section Q. 1., states, “Facilities will utilize information from the risk screening to inform housing, bed, work, education and program assignments with the goal of keeping those incarcerated individuals who are at high risk of being sexually victimized from those who are at high risk of being sexually abusive. The institution's physical plant, staffing levels, size, and number of programs and services, as well as activity schedules, will determine the extent to which separation is possible or contacts minimized. Computer tracking of high-risk incarcerated individuals within an institution may be utilized. Facilities will make individualized determinations about how to ensure the safety of each incarcerated individual.”

The facility provided an Inmate Information screenshot demonstrating a Risk Factors and PREA section identifies the Incarcerated Individuals risk for the following areas.

- Suicide Risk
- Violence to Inmates
- Violence to Staff
- Victim Potential
- Current PREA Sexual Violence Potential Scores Available
- Current PREA Sexual Victimization Potential Scores Available
- PREA Violence/Vitim Potential (NEW)

	(b) The Nebraska State Penitentiary PAQ states the agency/facility makes individualized determinations about how to ensure the safety of each inmate. Policy compliance can be found in provision (a) of this standard. Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. The facility demonstrated a proactive approach to utilizing risk screening information to make individualized housing assignments and implement additional safeguards for vulnerable incarcerated individuals. All 17 targeted incarcerated individuals interviewed (100%) reported feeling safe in their assigned housing units and confirmed that case management staff conduct monthly check-ins to assess their continued safety and well-being. Additionally, vulnerable incarcerated individuals are provided opportunities for private showering and housing arrangements designed to minimize contact with individuals identified as sexually aggressive. The consistency between staff interviews, incarcerated individual interviews, and site observations demonstrated that these practices are implemented throughout the facility. The ongoing assessment of individual safety needs, coupled with additional protective measures, reflects a commitment to preventing sexual victimization that extends beyond the minimum requirements of the standard.

115.51	**Inmate reporting**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. NDCS Reporting Posting 4. Verbal Report Documentation Interviews: 1. Corporals Interviews with Corporals demonstrated that staff are prepared to accept reports of sexual abuse and sexual harassment through multiple methods, regardless of how the information is communicated or who initiates the report. The Corporals explained

	that reports may be received verbally, in writing, anonymously, or through third parties. Staff indicated that written notes would be accepted even when the reporting individual did not identify themselves. Additionally, incarcerated individuals requesting grievance forms would be provided access to the grievance process. The Corporals demonstrated an understanding that allegations must be accepted and addressed regardless of the reporting method utilized. Site Observations: Site observations demonstrated that the facility's reporting hotline was operational and accessible through an incarcerated individual's telephone. During the onsite audit, the hotline was tested, and the PREA Coordinator demonstrated that the test message was delivered directly to her email. The recorded hotline instructions informed callers that allegations of sexual abuse or sexual harassment could be submitted anonymously or with whatever identifying information and details the caller chose to provide. An additional reporting test was conducted through the Ombudsman's Office. The Ombudsman confirmed that the office responds to questions and concerns raised by incarcerated individuals and, upon receiving a report, contacts the Warden to communicate the information provided by the caller. The facility's mailroom was also observed during the onsite review. Mailroom personnel described procedures for processing legal mail, including sorting incoming correspondence each morning, setting it aside, and documenting its receipt. Staff further explained that mail is logged again upon delivery to the incarcerated individual, providing an additional record of distribution. Procedures for documenting postage expenses were also described, including the provision of five postage stamps per month to indigent incarcerated individuals. Site observations further demonstrated that the records department was staffed by three employees working within a secured room. The room is locked when unoccupied, and access is generally limited to records personnel and authorized administrative staff or others with an identified operational need. (a) The Nebraska State Penitentiary PAQ states the agency has established procedures allowing for multiple internal ways for inmates to report privately to agency officials about: (a) sexual abuse or sexual harassment; (b) retaliation by other inmates or staff for reporting sexual abuse and sexual harassment; and (c) staff neglect or violation of responsibilities that may have contributed to such incidents.

(b) The Nebraska State Penitentiary PAQ states facility provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of the agency. The agency has a policy requiring inmates detained solely for civil immigration purposes be provided information on how to contact relevant consular officials and relevant officials of the Department of Homeland Security. The PAQ states, “The inmate population can contact the Ombudsman's office if they choose to. The Ombudsman's office is set up as a speed dial on the inmate calling system.” Policy compliance can be found in provision (a) of this standard.

(c) The Nebraska State Penitentiary PAQ states the agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties. Staff are required to document verbal reports.

Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 19, section S. 3-4, state, “Staff will accept all reports made verbally, in writing, anonymously, from other incarcerated individuals and from third parties outside NDCS. Verbal reports will be promptly documented.

Staff have the option of privately reporting sexual assault/abuse and sexual harassment of incarcerated individuals and retaliation against incarcerated individuals and staff by directly notifying the captain/PREA coordinator (402-479-5660) or utilizing the established hotline number (855-623-7360).”

The facility provided a NDCS Reporting Posting demonstrating the following is made available to incarcerated individuals.

- How to Report – internally and externally
- How to Contact the PREA Hotline

The facility provided a report of a verbal report demonstrating the following was documented.

- To / From / Incident Date / Re:
- Facility / Primary Location
- Incident Report Details

	· Staff Involved · Actions Taken · Notifications Made (d) The Nebraska State Penitentiary PAQ states the agency has established procedures for staff to privately report sexual abuse and sexual harassment of inmates. Policy compliance can be found in provision (c) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.52	**Exhaustion of administrative remedies**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 Interviews: 1. Random Incarcerated Individuals 2. Targeted Incarcerated Individuals 3. Administrative Program Officer / PREA Compliance Manager Interviews with incarcerated individuals demonstrated that they were aware of their ability to submit grievances electronically through their tablets, including grievances involving allegations of sexual abuse. The interview with the PREA Compliance Manager demonstrated that grievance boxes remain available throughout the facility, although most grievances are submitted electronically through incarcerated individuals' tablets. The PREA Compliance Manager explained that incarcerated individuals who have restrictions on their tablet

	access may request a paper grievance form from staff. Once completed, the grievance may be returned directly to staff or placed in one of the designated mail boxes located throughout the facility. These options provide incarcerated individuals with alternative methods for submitting grievances when electronic access is unavailable or restricted. (a) The Nebraska State Penitentiary PAQ states the agency has an administrative procedure for dealing with inmate grievances regarding sexual abuse. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 19, section T., states, “Incarcerated individuals will not be disciplined for filing a grievance related to alleged sexual assault/abuse or sexual harassment unless the facility demonstrates the grievance was deliberately filed in bad faith. NDCS does not impose a time limit on when an incarcerated individual may submit a grievance regarding an allegation of sexual assault/abuse or sexual harassment. Applicable time limits to any portion of a grievance that does not allege an incident of sexual assault/abuse or sexual harassment will be followed per policy. An incarcerated individual is not required to use any informal grievance process (i.e., an incarcerated individual may submit a Step I Grievance without an Informal Grievance attached) or otherwise attempt to resolve an alleged incident of sexual assault/abuse or sexual harassment with staff. An incarcerated individual who alleges sexual assault/abuse or sexual harassment may file a grievance without submitting it to a staff member who is the subject of the complaint. A grievance will not be referred to a staff member who is the subject of the complaint. A final response to the grievance will be issued within 90 days of the initial filing. This does not include time consumed by incarcerated individuals preparing an administrative appeal. An extension of up to 70 days may be requested if there is insufficient time to make an appropriate decision. Incarcerated individuals will be notified in writing of the extension and be provided a date by which the decision will be made. If the incarcerated individual does not receive a response or notification of an extension, he or she may consider the absence of a response to be a denial at that level. An incarcerated individual may also file an emergency grievance if he or she feels

there is a substantial risk of imminent sexual abuse/assault.

The emergency grievance will immediately be forwarded to the shift supervisor, who will take immediate corrective action. An initial response shall be provided within 24 hours and a final decision will be issued within five calendar days. The initial response and final decision will serve as documentation determining whether the incarcerated individual is at substantial risk of imminent sexual abuse/assault and the action taken in response to the emergency grievance."

(b) The Nebraska State Penitentiary PAQ states agency policy or procedure allows an inmate to submit a grievance regarding an allegation of sexual abuse at any time, regardless of when the incident is alleged to have occurred. Policy compliance can be found in provision (a) in this standard.

(c) The Nebraska State Penitentiary PAQ states the agency's policy and procedure allows an inmate to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. The agency's policy and procedure requires that an inmate grievance alleging sexual abuse not be referred to the staff member who is the subject of the complaint. Policy compliance can be found in provision (a) in this standard.

(d) The Nebraska State Penitentiary PAQ states the agency's policy and procedures that require a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 90 days of the filing of the grievance. In the past 12 months there has been zero grievances filed alleging sexual abuse.

(e) The Nebraska State Penitentiary PAQ states agency policy and procedure permit third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of inmates. Agency policy and procedure requires that if an inmate declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the inmate's decision to decline. The number of grievances alleging sexual abuse filed by inmates in the past 12 months in which the inmate declined third-party assistance, containing documentation of the inmate's decision to decline was zero. Policy compliance can be found in provision (a) in this standard.

(f) The Nebraska State Penitentiary PAQ states the facility has a policy and

	established procedures for filing an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse. The facilities policy and procedures for emergency grievances alleging substantial risk of imminent sexual abuse require an initial response within 48 hours. The facilities policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse require that a final agency decision be issued within five days. The number of emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months was zero. (g) The Nebraska State Penitentiary PAQ states the facility has a written policy that limits its ability to discipline an inmate for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the Inmate filed the grievance in bad faith. In the past 12 months, there have been zero grievances alleging sexual abuse to occasions where the agency demonstrated that the Inmate filed the grievance in bad faith. Policy compliance can be found in provision (a) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.53	**Inmate access to outside confidential support services**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Advocacy Attempt Memorandum, dated 7.8.2026 Interviews: 2. Captain / PREA Coordinator The interview with the PREA Coordinator demonstrated that Incarcerated Individuals who report sexual abuse would be connected with a facility and/or agency mental health provider, as the agency has been unable to secure an agreement with a community advocacy organization.

	(a) The Nebraska State Penitentiary PAQ states the facility provides inmates with access to outside victim advocates for emotional support services related to sexual abuse by: · The facility provides inmates with access to such services by giving inmates mailing addresses and telephone numbers (including toll-free hotline numbers where available) for local, state, or national victim advocacy or rape crisis organizations. · The facility provides inmates with access to such services by giving inmates mailing addresses and telephone numbers (including toll-free hotline numbers where available) for immigrant services agencies for persons detained solely for civil immigration purposes. · The facility provides inmates with access to such services by enabling reasonable communication between inmates and these organizations in as confidential a manner as possible. (b) The Nebraska State Penitentiary PAQ states the facility informs Inmates, prior to giving them access to outside support services, the extent to which such communications will be monitored. The facility informs inmates, prior to giving them access to outside support services, of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply for disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant Federal, State, or local law. (c) The Nebraska State Penitentiary PAQ states the facility maintains memoranda of understanding with community service providers that are able to provide inmates with emotional support services related to sexual abuse. The facility provided documentation of advocacy outreach efforts demonstrating the agency has made ongoing attempts to establish advocacy services through Advocacy and Government Affairs. These efforts demonstrate the agency’s continued attempt to secure access to outside advocacy services for inmates. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.54	**Third-party reporting**

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Nebraska State Penitentiary PAQ

2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025

Interviews:

1. Random Incarcerated Individuals

2. Targeted Incarcerated Individuals

3. Corporals

Interviews with inmates demonstrated most were aware of third-party reporting and each had the option of having a trusted adult in the community report for them.

Interviews with Corporals and facility personnel demonstrated each would accept a third-party report and immediately report the allegation to their supervisor, the Shift Supervisor, or the Captain.

Site Observation:

During the tour Zero Tolerance postings were observed with third party contact information, throughout the facility.

(a) The Nebraska State Penitentiary PAQ states the facility provides a method to receive third-party reports of inmate sexual abuse or sexual harassment. The agency publicly distributes information on how to report Inmate sexual abuse or sexual harassment on behalf of Inmates.

The Ombudsman reporting mechanism was tested using an Incarcerated Individual telephone. Following introductions and an explanation of the purpose of the call, the individual answering confirmed that information received through the Ombudsman's office is forwarded to the facility Warden

	Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 Interviews: 1. Corporals 2. Medical and Mental Health staff 3. Assistant Warden / Investigator 4. Administrative Program Officer / PREA Compliance Manager 5. Captain / PREA Coordinator 6. Warden Interviews with facility personnel demonstrated a consistent understanding of their responsibility to immediately report all allegations and suspicions of sexual abuse and sexual harassment. Staff emphasized the importance of promptly communicating information received through any reporting method to ensure allegations are brought to the attention of appropriate personnel. Interviews further demonstrated that staff recognize their mandatory reporting responsibilities and the importance of taking all allegations seriously, regardless of the source or manner in which the information is received. Site Observations: The review of investigative documentation using the PREA Audit Adult Prisons and Jails Documentation Review Investigation template demonstrated that allegations of sexual abuse and sexual harassment were received through multiple reporting methods. Of the investigations reviewed, five allegations originated through the

grievance process, two were received through third-party reports, four were reported verbally, and one involved an allegation reported from another facility where the incarcerated individual had previously been housed. The documentation demonstrated that allegations received through these reporting channels were identified and included in the facility's investigative records.

(a/c-d) The Nebraska State Penitentiary PAQ states the agency requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. The agency requires all staff to report immediately and according to agency policy any retaliation against Inmates or staff who reported such an incident. The agency requires all staff to report immediately and according to agency policy any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 21, section W., states, “All NDCS staff are required to report immediately and according to policy any knowledge, suspicion or information regarding:

1. An incident of sexual assault/abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency.

2. Retaliation against incarcerated individuals or staff who reported such an incident.

3. Any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Medical and mental health staff are obligated to report sexual assault/abuse and inform incarcerated individuals of their duty to report and the limitations of confidentiality at the initiation of services.

If the alleged victim is under 18 years old or considered a vulnerable adult, the allegations will be reported to the Department of Health and Human Services under applicable mandatory reporting laws.

Staff shall not reveal any information related to a sexual assault/abuse report to anyone other than to the extent necessary as specified in NDCS policy, to make treatment, investigations, and other security decisions.

	(b) The Nebraska State Penitentiary PAQ states, apart from reporting to designated supervisors or official and designated state or local service agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 Interviews: 1. Administrative Program Officer / PREA Compliance Manager 2. Associate Warden The interview with the PREA Compliance Manager demonstrated that incarcerated individuals may request protective custody at any time when they have concerns regarding their personal safety. The PREA Compliance Manager explained that placement in restricted housing for incarcerated individuals who have experienced sexual victimization, either within the facility or prior to admission, is uncommon. The facility generally seeks to address safety concerns without relying on restricted housing placements. The interview with the Associate Warden demonstrated that incarcerated individuals identified as victims of sexual abuse are typically placed in protective custody only when they request such placement. The Associate Warden further explained that circumstances requiring the facility or agency to initiate protective placement without a request from the incarcerated individual are rare. If such a placement becomes necessary, the Associate Warden indicated that it would generally be temporary and would not typically exceed 24 hours.

	(a) The Nebraska State Penitentiary PAQ states when the agency or facility learns that an inmate is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the Inmate. In the past 12 months, the facility reports zero inmates were subject to substantial risk of imminent sexual abuse. Upon discovery of inmates being subject to substantial risk, the facility immediately separates the victim from the perpetrator, made notification and completed incident reporting requirements. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 21, section X, states, “When NDCS learns that an incarcerated individual is subject to a substantial risk of imminent sexual assault/abuse, it shall take immediate action to protect them and assess and implement appropriate protective measures without unreasonable delay.” Through such reviews the facility meets the standard requirements.

115.63	**Reporting to other confinement facilities**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Nebraska Department of Correctional Services, Memorandum – Subject: 115.63 Notifications, dated 9.25.2026 Interviews: 1. Associate Warden 2. Deputy Director of Prisons Operations The interview with the Associate Warden demonstrated an understanding of the agency's requirements for reporting allegations of sexual abuse involving incarcerated individuals who were previously confined at another facility. The

	Associate Warden explained that upon receiving an allegation of sexual abuse that occurred at another confinement facility, the Warden is personally responsible for notifying the head of the facility where the alleged abuse occurred within 72 hours of receiving the allegation. The Associate Warden further indicated that the Warden would make the initial notification by telephone, followed by a written memorandum transmitted by email to document the notification and maintain a record of the communication. The interview with the Deputy Director of Prisons Operations demonstrated all sexual assault allegations are referred to the Nebraska State Patrol and are coordinated through the agency PREA Coordinator, facility PREA Compliance Manager, and criminal investigators. (a) The Nebraska State Penitentiary PAQ states the agency has a policy requiring that, upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. The agency's policy also requires that the head of the facility notify the appropriate investigative agency. In the past 12 months the facility has received two allegations that an inmate was abused while in confinement at another facility. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 22, section Y, states, "Within 72 hours of receipt of an allegation an incarcerated individual was sexually abused while confined at another facility, the receiving warden/designee shall notify the warden/designee where the incident was alleged to have occurred and the captain/PREA coordinator. Such notification shall be documented. The captain/PREA coordinator will ensure an investigation is completed according to policy." The facility provided a memorandum, from the agency PREA Coordinator, addressed to the DOJ PREA Auditor, stating the following, "During the transition of a new PREA Compliance Manager at NSP it was discovered that the warden-to-warden notifications were not being completed. The previous compliance manager was not informing the NSP Warden to complete this notification. The new PREA Compliance Manager at NSP will be trained in the warden-to-warden notification process so that they do not get missed. The PREA Coordinator will also track this on the investigation tracker."

	(b) The Nebraska State Penitentiary PAQ states agency policy requires that the facility head provides such notification as soon as possible, but no later than 72 hours after receiving the allegation. Policy compliance can be found in provision (a) of this standard. (c) The Nebraska State Penitentiary PAQ states the facility documents that it has not had a need to provide such notification within 72 hours of receiving the allegation. Policy compliance can be found in provision (a) of this standard. (d) The Nebraska State Penitentiary PAQ states facility policy requires that allegations received from other agencies or facilities are investigated in accordance with the PREA standards. In the last 12 months, there have been seven allegations of sexual abuse. Policy compliance can be found in provision (a) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.64	**Staff first responder duties**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Post Audit: PREA Refresher First Responder Duties Training and Shift Log Documentation 4. Post Audit: Revised Sex Assault Response Cards, dated 2026 5. Post Audit: Memorandum, RE: PREA Standard 115.64 Staff First Responder Duties, dated 10.30.2026 Interviews: 1. Corporals

	Interviews with Corporals demonstrated that staff were knowledgeable about their responsibilities to separate alleged victims from alleged abusers and preserve potential physical evidence following an allegation of sexual abuse. Staff understood that alleged victims and abusers should not engage in activities that could destroy potential physical evidence, including washing, brushing their teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, when applicable. However, staff were unable to articulate the distinction between requesting that alleged victims refrain from actions that could destroy potential physical evidence and ensuring that alleged abusers do not engage in those activities. Specifically, staff were unaware that alleged victims must be requested, rather than directed, to refrain from such actions. Site Observation: Staff interviews demonstrated staff were not aware of first responder responsibilities related to preserving potential physical evidence following an allegation of sexual abuse. Specifically, staff were not aware that, when applicable, victims should be requested not to take actions that could destroy physical evidence, including washing, brushing their teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. Staff were also not aware of the requirement to ensure that alleged abusers do not take actions that could destroy potential physical evidence. Corrective Action Plan: Provide documented refresher training to applicable staff regarding all first responder responsibilities required by §115.64, including protecting the victim, separating the alleged victim and alleged abuser, preserving and protecting the crime scene, and preserving potential physical evidence. Training shall specifically address the requirement to request that victims not take actions that could destroy physical evidence and, when the alleged abuse occurred within the applicable timeframe, ensure that alleged abusers do not take actions that could destroy physical evidence. Appropriate facility personnel shall provide a memorandum outlining a sustainable action plan and identifying the designated position responsible for ensuring staff maintain knowledge of and consistently implement first responder responsibilities. The memorandum shall be addressed to the DOJ PREA Auditor and include the date, author, and applicable standard. Upload the memorandum, training materials, completed training documentation, and all supporting documentation to the corresponding provision within the Online Audit System. Post audit, the facility provided PREA refresher training records and shift logs demonstrating that applicable staff received additional training on first responder responsibilities, including encouraging victims of sexual abuse to refrain from

showering, brushing their teeth, changing clothing, or taking other actions that could destroy physical evidence.

Post audit, the facility provided revised Sexual Assault First Responder Cards, which all staff are required to carry as part of their uniforms to reinforce first responder responsibilities.

Post audit, the agency PREA Coordinator provided a memorandum addressed to the DOJ PREA Auditor outlining the completed first responder training and distribution of revised response cards to all staff as measures to ensure sustained compliance with §115.64.

(a) The Nebraska State Penitentiary PAQ states the agency has a first responder policy for allegations of sexual abuse. The policy requires that, upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report shall be required to separate, preserve, protect, collect physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. In the past 12 months, 12 allegations occurred where an inmate was sexually abused. Of these allegations of sexual abuse in the past 12 months, the number of times the first security staff member responded to the report separated the alleged victim and abuser was zero.

Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 22, section Z. 1., states, “Upon learning of an allegation an incarcerated individual was sexually assaulted, the first security staff member (team members primarily responsible for the supervision and control of incarcerated individuals, including but not limited to custody, housing unit, mental health, recreation, maintenance, teachers, etc.) to respond to the report shall be required to:

1) Separate the victim and abuser and ensure that the victim is safe.

2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.

3) Security staff and non-security staff that respond to an incident will request the alleged victim and ensure the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing/showering, brushing teeth,

	changing clothes, urinating, defecating, smoking, drinking or eating if the abuse occurred within a time period that allows for evidence collection (120 hours); and notify the shift supervisor immediately.” (b) The Nebraska State Penitentiary PAQ states the facility’s’ policy requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and notify security staff. Of the allegations that an inmate was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder was zero. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.65	**Coordinated response**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Facility checklist for Incidents of Sexual Assault Sexual Abuse and Sexual Harassment, dated 3.2025 Interviews: 1. Administrative Program Officer / PREA Compliance Manager The interview with the PREA Compliance Manager demonstrated that facility administrative personnel utilize an established institutional checklist when responding to allegations of sexual abuse or sexual harassment. The PREA Compliance Manager explained that Lieutenants have access to these checklists in their offices and electronically through the agency's shared drive. The shared drive also contains PREA-related forms, agency policies, and procedures, providing staff with centralized access to the resources necessary to guide their response to allegations. This process supports consistency in the facility's response and ensures that supervisory personnel have access to the applicable protocols and documentation requirements.

	(a) The Nebraska State Penitentiary PAQ states the facility developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership. The facility provided a Facility Checklist for incidents of sexual assault, sexual abuse and sexual harassment. The checklist documents the following information. · Date and time reported · Date and time of incident · Allegation Category · Alleged Victim-Name / Number · Alleged Perpetrator-Name/Number · Witnesses of the Incident – Name and Number · First Team Member(s) on Scene (with title) · Means of Discovery/Reporting Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.66	**Preservation of ability to protect inmates from contact with abusers**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. The Nebraska Association of Pubic Employees Local 61, dated 7.1.2025 – 6.30.2027

	4. Labor Contract Between The State of Nebraska and Protective Services, Fraternal Order of Police, Nebraska Protective Services, Lodge 88, dated 7.1.2025 – 6.30.2027 Interview: 1. Deputy Director of Prisons Operations The interview with the Deputy Director of Prisons Operations demonstrated the Department of Administrative Services have completed negotiations having the ability through agency policy and contract language to move, discipline and take appropriate action for reasons related to PREA. (a) The Nebraska State Penitentiary PAQ states the agency, facility, or any other governmental entity is responsible for collective bargaining on the agency's behalf has entered or renewed any collective bargaining agreement or other agreement since August 20, 2012, or since the last PREA audit, whichever is later. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 24, section BB., states, "NDCS shall not enter into any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any incarcerated individuals pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted. NDCS is not restricted from entering into or renewing agreements that govern the conduct of the disciplinary process or whether a no-contact assignment imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination the allegation of sexual abuse/assault is not substantiated." Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.67	**Agency protection against retaliation**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ

2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025

3. Retaliation Monitoring Log for Incarcerated Individuals, dated 7.2025

Interviews:

1. Lieutenant

2. Administrative Program Officer / PREA Compliance Manager

The interview with the Lieutenant demonstrated that retaliation monitoring responsibilities are assigned promptly following receipt of an allegation of sexual abuse, with monitoring beginning upon assignment. The Lieutenant explained that the process includes an initial meeting with the incarcerated individual to discuss retaliation monitoring, the investigative process, and available protections against retaliation. Monitoring contacts are conducted and documented every two weeks throughout the 90-day monitoring period, resulting in six scheduled contacts.

The Lieutenant further explained that monitoring includes direct communication with the incarcerated individual and consultation with staff regarding the individual's adjustment and treatment within the facility. Monitoring activities include reviewing potential indicators of retaliation, such as housing changes, negative evaluations, disciplinary reports, and other circumstances that may indicate adverse treatment following an allegation. Any identified concerns are communicated to the PREA Compliance Manager for further review.

Monitoring documentation includes the location, date, and time of contacts and identifies whether any concerns or incidents of retaliation were reported or observed. Upon completion of the monitoring period, a cover letter is submitted documenting the monitoring activities and contacts conducted. If concerns regarding potential retaliation continue or arise during the initial 90-day period, monitoring is extended beyond 90 days as necessary.

Site Observations:

The review of eight sexual abuse investigations demonstrated that retaliation monitoring was addressed based on the circumstances and investigative outcomes of each allegation. The records included completed monitoring activities, an allegation determined to be unfounded, allegations in which the alleged abuser could not be identified, and an instance in which the incarcerated individual was discharged from the facility before the conclusion of the 90-day monitoring period. These circumstances were considered when evaluating the applicability and duration of

retaliation monitoring.

(a) The Nebraska State Penitentiary PAQ states the agency has a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff. The agency designates staff member(s) or charges department(s) with monitoring for possible retaliation. The facility designates the PREA Compliance Manager, the Athletics/Recreation Manager, a Unit Manager and a Lieutenant as retaliation monitors.

Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 24, section CC. 1., states, “NDCS has an obligation to protect all incarcerated individuals and team members who report sexual assault/abuse or sexual harassment or cooperate with sexual assault/abuse or sexual harassment investigations from retaliation by other incarcerated individuals or staff. Examples of acts of retaliation include, but are not limited to, unnecessary discipline, intimidation, unnecessary changes in work or program assignments, unjustified transfers or placements and unjustified denials of privileges or services. The facility PREA compliance manager is responsible for monitoring retaliation against incarcerated individuals, the captain/ PREA coordinator is responsible for monitoring retaliation against staff. Staff who believe they have been subject to retaliation should contact the captain/PREA coordinator in order to initiate retaliation tracking.”

(c) The Nebraska State Penitentiary PAQ states the facility monitors the conduct or treatment of inmates or staff who reported sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation by inmates or staff. The length of time that the facility monitors the conduct of treatment is 90 days. The facility acts promptly to remedy any such retaliation. The agency/facility continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need. In the past 12 months, the facility has had zero incidents of retaliation.

The facility provided a Retaliation Monitoring Log for Incarcerated Individuals. The form documents the following.

- Victim Name / Number
- Incident Date
- Monitoring Begin Date
- Initial Review / Type

	· Initial Protection Measures · Investigation Results · Monitoring Ended Date · Periodic Checks – Date / Time / Misconduct Reports / Cell -Unit Changes / Program Changes / Job Change / Contact Notes – Comments / Initials Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.68	**Post-allegation protective custody**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 Interviews: 1. Associate Warden The interview with the Associate Warden demonstrated that protective custody and restricted housing placements for incarcerated individuals who have experienced sexual abuse are generally initiated at the request of the individual. The Associate Warden explained that facility leadership works collaboratively with wardens throughout the Nebraska Department of Correctional Services to identify appropriate housing alternatives when an incarcerated individual has experienced sexual abuse or is determined to be at heightened risk of sexual victimization. The Associate Warden further indicated that when the facility cannot provide a safe housing placement for an incarcerated individual, arrangements may be made to transfer the individual to another correctional facility within the state where their safety and housing needs can be appropriately addressed. This collaborative approach provides an alternative to restricted housing and supports efforts to protect incarcerated individuals from further victimization while considering their individual

	safety concerns. (a) The Nebraska State Penitentiary PAQ states the agency has a policy prohibiting the placement of inmates who allege to have suffered sexual abuse in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been made that there is no available alternative means of separation from likely abusers. The number of inmates who alleged to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment was zero. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.71	**Criminal and administrative agency investigations**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Fiscal Year 26 PREA Tracker Interviews: 1. Unit Manager / Investigator 2. Captain / PREA Coordinator The interview with the Unit Manager demonstrated an understanding of the agency's administrative investigative procedures for allegations of sexual abuse and sexual harassment. The Unit Manager explained that upon being assigned an investigation, he generally initiates investigative activities within a few days. His process begins with a thorough review of available incident reports and supporting documentation, followed by the development of an investigative plan identifying the individuals to be interviewed and the appropriate sequence of interviews.

	The Unit Manager further explained that investigative activities include reviewing available video surveillance footage, examining relevant dates, times, and locations, and comparing information obtained through interviews and documentation to corroborate or refute reported allegations. He emphasized that the same investigative procedures are followed regardless of the source of the allegation and that all reports are taken seriously. The Unit Manager demonstrated an understanding of the importance of assessing credibility based on the facts and evidence obtained during the investigation. He explained that credibility determinations are documented and supported by investigative findings rather than assumptions regarding the individuals involved. Additionally, investigations continue to completion even when the alleged victim or alleged abuser is transferred or otherwise leaves the facility before the investigation is concluded. The Unit Manager further indicated that investigations include an assessment of whether staff actions or failures to act may have contributed to the alleged sexual abuse. This assessment includes reviewing surveillance footage, incident reports, staff interviews, and institutional logbooks to determine whether staff were present, performing assigned duties, and following established procedures during the relevant timeframe. The Unit Manager demonstrated an understanding that administrative investigative findings are determined using the preponderance of the evidence standard, meaning the available evidence establishes that an allegation is more likely than not to have occurred. The interview with the PREA Coordinator demonstrated she keeps in contact with and has regular meetings with the agency criminal investigators and the Nebraska State Patrol to stay informed on sexual abuse investigation status. Site Observation: The review of investigative documentation utilizing the PREA Audit – Adult Prisons and Jails Documentation Review – Investigations template demonstrated that all 12 investigations reviewed contained the applicable required investigative elements. The investigative reports were thorough, well-organized, and supported by documentation addressing the circumstances of each allegation, investigative activities conducted, evidence reviewed, and findings reached. The review demonstrated a consistent and comprehensive approach to documenting investigations of sexual abuse and sexual harassment, with all applicable investigative requirements addressed in the records reviewed.

	Additionally, the agency's Fiscal Year 2026 PREA Tracker demonstrated a comprehensive system for monitoring investigative activities, timelines, administrative reviews, and case dispositions. The tracking system captures multiple stages of the investigative process, including the initiation of investigations, assigned investigators, anticipated completion dates, extensions and their justifications, reports returned for correction, legal reviews, investigative determinations, victim notifications, and recommendations for corrective or disciplinary action. This level of documentation provides administrative personnel with a centralized mechanism for monitoring investigative progress, identifying potential delays, and maintaining accountability throughout the investigative process. (a-b) The Nebraska State Penitentiary PAQ states the agency/facility has a policy related to criminal and administrative agency investigations. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 25, section EE., states, “NDCS shall ensure that an administrative or criminal investigation is completed for all allegations of sexual assault/abuse and sexual harassment, including third party and anonymous reports, in a prompt, thorough and objective manner. Any outside entities responsible for conducting administrative or criminal investigations of sexual assault/abuse shall have in place a policy governing the conduct of such investigations that complies with PREA standards and shall provide training pertaining to the investigation of sexual assault/abuse in confinement settings to the agents and investigators who conduct such investigations. When outside agencies investigate sexual abuse/assault, NDCS shall cooperate with outside investigators and endeavor to remain informed about the progress of the investigation.” The agency provided a Fiscal Year 2026 PREA Tracker demonstrating that investigative data is consistently documented and tracked throughout the fiscal year, including the following information: · Case # / Status of Case / Logging Date · Communication Method of Alleged Incident · Report Date / SIR Date · Individual’s Assigned Facility · Date of Alleged Incident · Location of Alleged Incident · Facility Notified within 72 Hours (if applicable)

	· Summary of Allegation · Allegation Category / Allegation Comment · Investigator Name · Est. Due Date / Extension Due Date / Reason for Extension · Date Returned for Correction / Reason for Correction · Date Sent to Law Clerk / Date Returned from Law Clerk · Date Sent to ASA Review / Comments · Date of Investigation Completed / Allegation Determination / Justification of Determination · Date Victim Notified · SAIR Review Date (if applicable) · Improvements Recommended? / Disciplinary Action Recommended? · Amount of Days to Complete · Initiation of Investigation / Length of Investigation / Total Days from Report to Disposition · Length of Legal Review · Amount of Days to Notify Victim (h) The Nebraska State Penitentiary PAQ states there has been zero allegations of conduct that appear to be criminal that was referred for prosecution, since the last audit date. (i) The Nebraska State Penitentiary PAQ states the agency retains all written reports pertaining to administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. The facility demonstrated a comprehensive and systematic approach to conducting, documenting, and monitoring investigations of sexual abuse and sexual harassment. All 12 investigations reviewed contained the applicable required investigative elements, and the agency maintained a detailed tracking system that extended beyond basic case documentation to include

	investigative timelines, administrative oversight, legal review, victim notifications, and case disposition. These practices, combined with ongoing communication between facility personnel, agency criminal investigators, and the Nebraska State Patrol, demonstrated an enhanced level of investigative coordination, documentation, and administrative oversight.

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 Interviews: 1. Unit Manger / Investigator The interview with the Investigator demonstrated an understanding that the agency applies no standard higher than a preponderance of the evidence when determining whether allegations of sexual abuse or sexual harassment are substantiated. The Investigator explained that administrative investigative findings are based on the facts and evidence obtained throughout the investigative process, with a substantiated determination requiring that the available evidence establish that the alleged conduct more likely than not occurred. This evidentiary standard guides the assessment of investigative findings and the determination of whether allegations are substantiated. (a) The Nebraska State Penitentiary PAQ states the agency imposes a standard of a preponderance of the evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 28, section FF., states, “NDCS shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual assault/ abuse or sexual harassment are substantiated.”

	Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.73	Reporting to inmates
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. NDCS / PREA Investigation Inmate Notification Form, dated 3.2025 4. Final Report Notification Sample Interviews: 1. Administrative Program Officer / PREA Compliance Manager The interview with the PREA Compliance Manager demonstrated that incarcerated individuals are notified of investigative outcomes both verbally and in writing. The PREA Compliance Manager explained that he personally provides these notifications and documents them using the agency's PREA Investigation Inmate Notification Form. This process provides incarcerated individuals with direct communication regarding investigative determinations and establishes written documentation of the notification. Site Observations: The review of 12 investigations demonstrated that 11 contained documentation of notification to the alleged victim regarding the investigative outcome. Notifications were documented for allegations involving both sexual abuse and sexual harassment. The review further demonstrated that notifications were provided for allegations involving incidents reportedly occurring many years before they were brought to the facility's attention, including allegations dating to the 1990s and 2015–2016 that were reported in 2026. The remaining investigation involved an allegation reportedly occurring in 2002 and

	referred for investigation in January of 2026. Although the investigative documentation addressed the allegation and the incarcerated individual's history of protective separation measures, the record did not contain documentation demonstrating that the individual received notification of the investigative outcome. The review identified historical documentation concerns associated with a previous PREA Compliance Manager. (a) The Nebraska State Penitentiary PAQ states the agency has a policy requiring that any inmate who alleges that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency. The number of criminal and/or administrative investigations of alleged inmate sexual abuse that were completed by the agency/facility in the past 12 months was 12. Of the alleged sexual abuse investigations that were completed in the past 12 months, the number of inmates who were notified, verbally or in writing, of the results of the investigation was 11. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 26, section GG. 1., states, “Following an investigation into an inmate’s allegation that he or she suffered sexual assault/abuse or harassment, the inmate shall be informed as to whether the allegation has been determined to be substantiated, unsubstantiated or unfounded. If NDCS did not conduct the investigation it shall request the relevant information from the Nebraska State Patrol in order to inform the inmate. All notifications or attempts shall be made by the captain/PREA coordinator or designee and documented. The obligation to report is terminated if the inmate is released from NDCS custody.” The facility provided a NDCS / PREA Post Investigation Inmate Notification. This notification documents the following: · Inmate Name / Number / Case Number · Nature of Allegation · Allegation Category · Did the victim receive written/verbal/Notice of Investigation? · Did the investigation include outside agency? If yes, Name of Agency and date notified · Date Investigation began and concluded · Victim must be notified of the below throughout the investigation

	o Victim notified on of aggressor (team member) removed from inmates unit o Victim notified on of aggressor (incarcerated individual) separated from the victim. · Below Sanction Imposed – unless unfounded or unsubstantiated o Victim notified on of aggressor (team member) no longer employs o Victim notified on of aggressor (team member or incarcerated individual) indicted o Victim notified on of aggressor (team member or incarcerated individual) convicted · Finding of investigation o Case open with State Patrol o Substantiated – allegation was investigated and determined to have occurred o Unfounded – allegation was investigated and determined not to have occurred o Unsubstantiated – allegation was investigated, and the investigation produced insufficient evidence to make a final determination as to whether or not the event occurred · Victim Signature/Inmate #/Date/Time · PREA Compliance Manager signature/Date/Time · Facility Warden signature/Date/Time · PREA Coordinator signature/Date/Time (b) The Nebraska State Penitentiary PAQ states if an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity to inform the Inmate as to the outcome of the investigation. The number of investigations of alleged inmate sexual abuse in the facility that were completed by an outside agency in the past 12 months was zero, however, one criminal investigation is currently ongoing with the Nebraska State Patrol. (c) The Nebraska State Penitentiary PAQ states following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency/facility subsequently informs the inmate (unless the agency has determined that the allegation is unfounded) whenever: • The staff member is no longer posted within the inmate's unit;

	• The staff member is no longer employed at the facility; • The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or • The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.” (d) The Nebraska State Penitentiary PAQ states following an inmate’s allegation that he or she has been sexually abused by another inmate in an agency facility, the agency subsequently informs the alleged victim whenever: the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. (e) The Nebraska State Penitentiary PAQ states the agency has a policy that all notifications to inmates described under this standard are documented. In the past 12 months, there have been 12 notifications provided to incarcerated individuals, pursuant to this standard. Of those notifications, in the past 12 months, 12 notifications were documented. Policy compliance can be found in provision (a) of this standard. The facility provided a Final Report sample demonstrating the following is documented. · To / From / Date / Subject · Allegations · Conclusion · Synopsis · Finding of Facts · Interviews · History of Prior Investigations · Attachments Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. The facility demonstrated a commitment to communicating investigative outcomes through both verbal and written notifications, including notifications involving sexual harassment allegations and allegations

	reported many years after their occurrence. The current PREA Compliance Manager described a consistent notification and documentation process, and the investigative records demonstrated that this practice was implemented in the majority of cases reviewed.

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 Interviews: 1. Associate Warden The interview with the Associate Warden demonstrated an understanding of the agency's disciplinary procedures for employees involved in substantiated incidents of sexual abuse or sexual harassment. The Associate Warden explained that allegations involving staff may result in immediate law enforcement involvement, including possible arrest, depending on the circumstances of the incident. Employees found to have engaged in sexual abuse may be subject to termination, and facility access would be restricted as appropriate. The Associate Warden further indicated that allegations involving potentially criminal conduct are referred to the Nebraska State Patrol for investigation and possible prosecution. When an employee holds a professional license or certification, the appropriate department head is responsible for notifying the applicable licensing board when warranted. Site Observations: The review of facility information demonstrated that no staff members were disciplined for violations of the agency's sexual abuse or sexual harassment policies during the preceding 12-month review period. (a) The Nebraska State Penitentiary PAQ states staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. In the past 12 months, the number of those staff from the facility

	who have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies was zero. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 29, section HH, states, “Staff members shall be subject to disciplinary sanctions up to and including termination for violating agency sexual assault/abuse or sexual harassment policies. Disciplinary sanctions for violations of agency policies relating to sexual assault/abuse or sexual harassment (other than actually engaging in sexual assault/abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history and the sanctions imposed for comparable offenses by other staff with similar histories. Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual assault/abuse. All terminations for violations of agency sexual assault/abuse or sexual harassment policies, or resignations by staff who may have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.” (b) The Nebraska State Penitentiary PAQ states in the last 12 months, there has been zero staff from the facility that have violated agency sexual abuse or sexual harassment policies. (c) The Nebraska State Penitentiary PAQ states disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member’s disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. In the past 12 months, the number of staff from the facility who have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies (other than actually engaging in sexual abuse) is zero. Policy compliance can be found in provision (a) of this standard. (d) The Nebraska State Penitentiary PAQ states all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. In the past 12 months, zero staff have been terminated for sexual abuse or harassment. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 Interviews: 1. Associate Warden The interview with the Associate Warden demonstrated that contractors and volunteers alleged to have engaged in sexual abuse or sexual harassment would be immediately restricted from contact with incarcerated individuals while the allegation is addressed. The Associate Warden explained that the facility would follow procedures comparable to those applicable to employees, including restricting facility access, initiating appropriate investigative actions, and referring potentially criminal conduct to law enforcement. Additionally, the facility would notify the contracting organization or volunteer's affiliated agency regarding the allegation and any resulting restrictions or actions. If a contractor or volunteer holds a professional license or certification, the appropriate agency department head is responsible for notifying the applicable licensing board when warranted. Site Observations: The review of facility information demonstrated that no contractors or volunteers were subject to disciplinary or other corrective action for violations of the agency's sexual abuse or sexual harassment policies during the previous audit cycle. (a) The Nebraska State Penitentiary PAQ states agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. Agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with Inmates. In the past 12 months, there have been zero contractors or volunteers reported to law enforcement or relevant licensing bodies for engaging in sexual abuse of inmates.

	Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 29, section HH. II., states, “Any contractor or volunteer who engages in sexual assault/abuse shall be prohibited from contact with incarcerated individuals and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. The facility shall take appropriate remedial measures, and shall consider whether to prohibit further contact with incarcerated individuals, in the case of any other violation of agency sexual assault/abuse or sexual harassment policies by a contractor or volunteer.” (b) The Nebraska State Penitentiary PAQ states the facility takes appropriate remedial measures and considers whether to prohibit further contact with Inmates in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.78	**Disciplinary sanctions for inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Nebraska Department of Correctional Services Rules and Regulations Manual, dated 3.28.2023 Interviews: 1. Associate Warden The interview with the Associate Warden demonstrated that incarcerated individuals found to have engaged in sexual abuse are subject to agency disciplinary procedures and appropriate measures to protect the victim from further contact with the alleged abuser. The Associate Warden explained that these measures include separating the individuals involved, considering transfers to another correctional facility, and imposing disciplinary sanctions consistent with agency policy and investigative

findings. Additionally, the facility utilizes a central monitoring designation to prevent the individuals from being housed together at the same facility in the future. These measures are intended to maintain separation, address substantiated misconduct, and reduce the potential for further victimization.

Site Observations:

The review of facility information demonstrated that six allegations of incarcerated individual-on-incarcerated individual sexual abuse were reported during the previous audit cycle. None of these allegations resulted in referrals to law enforcement, and there were no criminal findings of guilt associated with the reported incidents.

(a) The Nebraska State Penitentiary PAQ states inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse. Inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse. In the past 12 months, the number of administrative findings of inmate-on-inmate sexual abuse that have occurred at the facility was six. In the past 12 months, the number of criminal findings of guilt for inmate-on-inmate sexual abuse that have occurred at the facility was zero.

Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 29-30, section JJ. 1., states, “Incarcerated individuals shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding the incarcerated individual engaged in incarcerated individual-on-incarcerated individual sexual assault/abuse/assault or sexual harassment or following a criminal finding of guilt for incarcerated individual-on-incarcerated individual sexual abuse/assault.

If a Misconduct Report (MR) has not previously been issued, an MR shall be issued to the abuser by the facility PREA compliance manager after he or she receives the result of the investigation from the captain/PREA coordinator confirming the allegation has been substantiated. The point of discovery for the violation will be when the results of the investigation are received by the facility PREA compliance manager/designee. A copy of the MR will be placed in the investigation file upon hearing findings.”

(d) The Nebraska State Penitentiary PAQ states the facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. The facility offers therapy, counseling, or other

	interventions designed to address and correct the underlying reasons or motivations for abuse, the facility considers whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits. (e) The Nebraska State Penitentiary PAQ states the agency disciplines inmates for sexual contact with staff only upon finding that the staff member did not consent to such contact. (f) The Nebraska State Penitentiary PAQ states the agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation. (g) The Nebraska State Penitentiary PAQ states the agency prohibits all sexual activity between inmates. If the agency prohibits all sexual activity between inmates and disciplines inmates for such activity, the agency deems such activity to constitute sexual abuse only if it determines that the activity is coerced. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.81	**Medical and mental health screenings; history of sexual abuse**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Nebraska Department of Correctional Services, Mental Health Services Policy 115.23, dated 12.31.2025 4. 14-Day Follow Up Information Form

Interviews:

1. Nurse Administrator

2. Behavioral Health Professional

3. Unit Manager

The interview with the Unit Manager demonstrated that referrals for mental health services are communicated through email notifications and documented in the agency's Nebraska Inmate Case Management System (NICaMS). The Unit Manager explained that these procedures provide a record of referrals and support communication with mental health personnel when incarcerated individuals disclose prior sexual victimization or require additional assessment and services.

Interviews with medical and mental health practitioners demonstrated an understanding of their responsibility to report disclosures of past or present sexual abuse and sexual harassment to the appropriate custody personnel. Both practitioners explained that incarcerated individuals are informed of the limits of confidentiality and applicable reporting obligations when disclosing information related to sexual victimization. The practitioners further indicated that incarcerated individuals who disclose sexual abuse or report an allegation are seen immediately to address their needs and determine whether additional medical or mental health services are necessary.

(a/c) The Nebraska State Penitentiary PAQ states all Inmates at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.41 are offered a follow-up meeting with a medical or mental health practitioner. Follow up meetings were offered within 14 days of the intake screening with 100% inmates who disclosed prior victimization during the intake screening. Medical and mental health staff maintain secondary materials, documenting compliance with the above required services.

Nebraska Department of Correctional Services, Mental Health Services Policy 115.23, page 3, section C states, “NDCS team members may initiate a mental health referral for incarcerated individuals using the Mental Health/Medical Referral Form (Attachment A). Incarcerated individuals

referred for mental health treatment will receive a comprehensive evaluation by a QMHP. The referral form should be sent to DCS.BehavioralHealthOp@Nebraska.gov mailbox. The evaluation is to be completed within 14 days of the referral receipt date and include at least the following:

1. Review of mental health screening and appraisal data.

2. Direct observation of behavior.

3. Collection and review of additional data from individual diagnostic interviews and tests assessing personality, intellect, and coping abilities.

4. Compilation of the individual's mental health history.

5. Development of an overall treatment/management plan with appropriate referral to include transfer to mental health facility for incarcerated individuals whose psychiatric needs exceed the treatment capability of the facility."

Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 31, section KK., states, "If the screening pursuant to PREA Standard 115.41 indicates that a prison/jail incarcerated individuals has experienced prior sexual victimization, or has perpetrated sexual assault/abuse whether it occurred in an institutional setting or in the community, staff shall ensure that the incarcerated individuals offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening. Any information related to sexual victimization or abusiveness is strictly limited to medical and mental health practitioners and staff as necessary for treatment plans, security, housing, work education and program assignments. (ACl-3D-13)

During an intake screening the incarcerated individual does not report prior victimization and or abusiveness, but once seen by medical and mental health and decides to report victimization and or abusiveness the facility PREA compliance manager will be notified of such to ensure that a proper PREA screening assessment is completed.

Medical and mental health staff shall obtain informed consent from incarcerated individuals before reporting prior information about sexual victimization that did not occur in an institutional setting, unless the incarcerated individual is under 18 years of age."

The facility provided a 14-Day Follow Up Information form demonstrating the following is documented.

k. ID# / Inmate Name

l. Type / Date / Referred by / Time Spent

m. Comments / Recorder

	(b) The Nebraska State Penitentiary PAQ states all Inmates who have previously perpetrated sexual abuse, as indicated during the screening pursuant to § 115.41, are offered a follow-up meeting with a mental health practitioner. In the past 12 months, the percent of inmates who have previously perpetrated sexual abuse, as indicated during the screening, who were offered a follow-up meeting with a mental health practitioner was 100%. Policy compliance can be found in provision (a) of this standard. (d) The Nebraska State Penitentiary PAQ states, information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners. Policy compliance can be found in provision (a) of this standard. (e) The Nebraska State Penitentiary PAQ states medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institution setting unless the inmate is under the age of 18. Policy compliance can be found in provision (a) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.82	**Access to emergency medical and mental health services**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ Interviews: 1. Nurse Administrator The interview with the Nurse Administrator demonstrated that victims of sexual abuse are referred to Bryan West Hospital for forensic medical examinations and appropriate medical services. She explained that medical and security personnel work collaboratively, maintaining open communication and sharing relevant information to ensure timely referrals and coordination of services for Incarcerated Individuals

	reporting sexual abuse. The Nurse Administrator further demonstrated that established nursing protocols guide the medical response to allegations of sexual abuse, including the identification of immediate healthcare needs and appropriate referrals. She explained that victims are provided timely access to emergency contraception and sexually transmitted infection prophylaxis, when medically appropriate, with follow-up medical services coordinated immediately upon their return from the hospital. She further confirmed that pregnancy-related healthcare services, including access to abortion services as permitted under Nebraska law, are made available through appropriate medical referrals. Site Observation: In the past 12 months the facility has had zero inmates who needed emergency services due to sexual abuse. (a/b) The Nebraska State Penitentiary PAQ states Inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment. Medical and mental health staff maintain secondary materials (e.g., form, log) documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services concerning contraception and sexually transmitted infection prophylaxis (c) The Nebraska State Penitentiary PAQ states inmate If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant to § 115.62 and shall immediately notify the appropriate medical and mental health practitioners. (d) The Nebraska State Penitentiary PAQ states treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ Interviews: 1. Nurse Practitioner 2. Behavioral Health Practitioner Interviews with medical and mental health practitioners demonstrated that a continuum of medical and mental health care is initiated when an incarcerated individual returns to the facility following a forensic medical examination. Both practitioners explained that they would return to the facility after regular working hours, if necessary, to ensure that the individual receives timely assessment and appropriate follow-up services. The practitioners further demonstrated that medical and mental health personnel coordinate closely with security staff to address the needs and safety of individuals involved in allegations of sexual abuse. They explained that appropriate medical and mental health evaluations of both the alleged victim and alleged perpetrator would be completed before either individual is returned to their assigned housing unit. This coordinated process supports continuity of care and consideration of individual safety and treatment needs following an allegation of sexual abuse. Site Observations: The review of facility information demonstrated that there were no incidents requiring emergency medical or mental health services related to sexual abuse during the preceding 12-month review period. (a-c) The Nebraska State Penitentiary PAQ states the facility offers medical and mental health evaluation and, as appropriate, treatment to all Inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.

(d) This provision is not applicable as the Nebraska State Penitentiary does not house females.

(e) This provision is not applicable as the Nebraska State Penitentiary does not house females.

(f) The Nebraska State Penitentiary PAQ states inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

(g) The Nebraska State Penitentiary PAQ states treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

The facility provided a mental health response to allegations of sexual assault to include the following protocols.

· Upon the inmate's return to the facility (or after declining medical treatment), the inmate will be place on fifteen minute check status until evaluated by mental health staff.

· During daytime business hours, medical staff (or security staff when medical is unavailable) will make both a verbal and written referral to mental health.

· After daytime business hours, medical (or security) staff will contact the Mental Health Officer of the Day (MHOD) immediately. The MHOD will notify her/his Institutional Mental Health Supervisor (IMHS) who will arrange for the post-incident mental health assessment of the Inmate.

· A mental health staff person will meet with the inmate within one working day after the referral is received to determine the need for crisis intervention and/or long-term counseling.

(h) The Nebraska State Penitentiary PAQ states they attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners.

Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, dated 7.31.2025 3. Nebraska Department of Correctional Services, Sexual Abuse Incident Review (SAIR), dated 2023 4. Post Audit: Training Documentation 5. Post Audit: Memorandum, RE: PREA Standard 115.86 Sexual Assault Incident Review, dated 10.22.2026 Interviews: 1. Captain / PREA Coordinator 2. Associate Warden The interview with the PREA Coordinator demonstrated that delays in completing sexual abuse incident reviews were attributed to newly implemented Central Office protocols that affected the timely return of investigative reports to the facility. The PREA Coordinator indicated that she intended to discuss these protocols with administration to address the delays and improve the timeliness of the review process. The interview with the Associate Warden demonstrated that the facility's sexual abuse incident review team includes the PREA Coordinator, Deputy Warden, Housing Unit Managers, Warden, and representatives from Medical and Mental Health. The team reviews completed investigations to identify contributing factors, assess whether incidents could have been prevented, and determine whether additional corrective or preventive measures are necessary. Using the Sexual Abuse Incident Review (SER) form, the team evaluates factors such as whether the incident involved a targeted assault, the potential motivation for the incident, opportunities for prevention, and the need for additional video monitoring. The Associate Warden indicated that sexual abuse incidents are reviewed monthly and that staff meet monthly to discuss the reviews. She further stated that the facility's expectation is to

	complete each sexual abuse incident review within 30 days of the close of the investigative report. When recommendations are identified, responsibility for implementation is assigned to the appropriate department head based on the nature of the recommendation. The PREA Coordinator and PREA Compliance Manager provide oversight in collaboration with the responsible department head to ensure recommendations are implemented and sustained. Site Observation: Investigation review demonstrated that sexual abuse incident reviews were not consistently completed within 30 days of the conclusion of the investigation, as required by the standard. Corrective Action Plan: Review the current agency- and facility-level process for initiating, tracking, and completing sexual abuse incident reviews and develop a sustainable process to ensure reviews are completed within 30 days of the conclusion of the investigation. Provide documented training to applicable staff responsible for initiating, completing, tracking, and/or providing oversight of sexual abuse incident reviews. Training shall include the applicable requirements of §115.286 and the established process for ensuring timely completion. Appropriate facility personnel shall provide a memorandum outlining the sustainable action plan, including the process that will be utilized to track timely completion and the designated position responsible for ongoing oversight to ensure the requirements of §115.86 are consistently implemented and maintained. The memorandum shall be addressed to the DOJ PREA Auditor and include the date, author, and applicable standard. Upload the memorandum, training documentation, and all other supporting documentation to the corresponding provision within the Online Audit System. Post audit, the facility provided two signed copies of the agency’s Sexual Assault/ Abuse Policy, with Section NN, PREA Standard 115.86(a)–(b) for Secure Facilities and 115.286(a)–(b) for Community Facilities, Sexual Abuse Incident Reviews, highlighted. The signed documents demonstrate that the PREA Compliance Manager and PREA Coordinator completed additional training and reviewed the requirements associated with conducting sexual abuse incident reviews. Post audit, the agency PREA Coordinator provided a memorandum to the DOJ PREA Auditor with a sustainable action plan documentation demonstrating that the PREA Coordinator evaluated and revised the agency's Sexual Abuse Incident Review (SAIR)

process to ensure reviews are completed within the required 30-day timeframe. The revised process establishes the conclusion of an investigation as the date the investigative findings are formally approved through the review process. The PREA Coordinator implemented procedures to minimize delays in returning completed investigations to the facility, notify the Facility PREA Compliance Manager when a SAIR is required, and establish a completion deadline not to exceed 30 days. The PREA Coordinator will monitor established timelines to ensure reviews are completed as required. Additionally, the agency revised the SAIR template to streamline documentation requirements, improve efficiency, and reduce the time necessary to complete incident reviews. Supporting documentation included the revised procedures and training curriculum provided to the Facility PREA Compliance Manager, demonstrating the agency's efforts to establish a consistent, timely, and sustainable incident review process.

(a) The Nebraska State Penitentiary PAQ states the facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. In the past 12 months there has been five investigations of alleged sexual abuse completed within in 30 days.

Nebraska Department of Correctional Services, Sexual Assault/Abuse Policy 203.11, page 32, section NN. 1., state, “

1. The facility shall conduct a Sexual Abuse Incident Review at the conclusion of every sexual assault/abuse investigation for all substantiated and unsubstantiated allegations. II is not necessary to complete Incident Reviews for occurrences for allegations of sexual harassment.

2. The facility PREA Management Team is responsible for conducting the incident review and shall ordinarily meet within 30 days of the final review and closing of the investigation. The facility PREA compliance manager will oversee the PREA Management Team, which will include, at a minimum, one person from each of the following:

a. Upper-level management officials (i.e., Deputy, Associate or Assistant Warden; Major; Captain; Unit Administrator)

b. Line supervisors (i.e., Lieutenant, Sergeant, Unit Manager, Unit Case Manager)

c. Investigative staff (i.e., Intelligence supervisor or other Intelligence staff)

d. Medical or mental health staff Specific operational procedures regarding the PREA Management Teams are detailed in facility written Procedures.

	The facility provided a Nebraska Department of Correctional Services, Sexual Abuse Incident Review (SAIR). The review includes the following. · Location of the Incident: · Type of Incident: · Incident Date: · Incident Discovery: · Allegation and Synopsis of Investigation: · Timeline of Investigation: o This is the timeline, once assigned · Team Members Involved in Incident Response · Allegation Determination · Key Strengths Identified During the Incident · Opportunities/areas for Improvement Include · Changes in Policy/Practice Needed · Incident Motivation · Staffing Levels · Monitoring Technology · Recommendations for Improvement · Conclusion · Date Report Prepared for Review · Team Members who Reviewed Incident The SAIR is signed and dated by the PREA Compliance Manager, Warden, Agency PREA Coordinator, Assistant Deputy Director of Intelligence, Investigations Coordinator, and the Facility Specific Deputy Director. (b) The Nebraska State Penitentiary PAQ states sexual abuse incident reviews are ordinarily conducted within 30 days of concluding the criminal or administrative investigation. In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only “unfounded” incidents were two. Policy compliance can be found in provision (a) of this standard.

	(c) The Nebraska State Penitentiary PAQ states the sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners. Policy compliance can be found in provision (b) of this standard. (d) The Nebraska State Penitentiary PAQ states the facility prepares a report of its findings from sexual abuse incident reviews, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1) -(d)(5) of this section, and any recommendations for improvement and submits such report to the facility head and PREA Compliance Manager. (e) The Nebraska State Penitentiary PAQ states, the facility implements recommendations for improvement or documents its reasons for not doing so. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.87	**Data collection**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ Interviews: 1. Captain / PREA Coordinator The interview with the PREA Coordinator demonstrated each facility PREA Compliance Manager provides her with annual sexual harassment and sexual abuse investigation numbers which are then aggregated across the agency for review and collection for the agency annual report. (a) The Nebraska State Penitentiary PAQ states the agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.

	(b) The Nebraska State Penitentiary PAQ states the agency aggregates incident-based sexual abuse data at least annually. (c) The Nebraska State Penitentiary PAQ states the standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice. The facility provided a Survey of Sexual Victimization as their data collection. (d) The Nebraska State Penitentiary PAQ states the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. (e) The Nebraska State Penitentiary PAQ states the agency does obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates as the agency does not have private contracts. (f) The Nebraska State Penitentiary PAQ states the Department of Justice has requested agency data for the previous calendar year. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.88	**Data review for corrective action**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Nebraska Department of Correctional Services Annual PREA Assessment 2025

3. Nebraska State Penitentiary Annual PREA Assessment 2025

Interviews:

1. Captain / PREA Coordinator

2. Deputy Director of Prisons Operations

The interview with both the PREA Coordinator and the Deputy Director of Prisons Operations demonstrated each allegation of sexual harassment and sexual abuse is reviewed at the facility and agency level, at the time of the incident. In addition, recommendations provided for corrective action are reviewed to ensure implementation takes place at the facility and agency level if appropriate.

(a) The Nebraska State Penitentiary PAQ states the agency reviews data collected and aggregated pursuant to §115.87 to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, and training, including:

· Identifying problem areas;

· Taking corrective action on an ongoing basis; and

· Preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.

The facility provided a Nebraska State Penitentiary Annual PREA Assessment 2025 demonstrating the following is documented.

Section I – Document Purpose

Section II – Incarcerated Individual Population Overview

Section III – Assessment of Team Member

Section IV – Assessment of Video Monitoring/Technology

Section V – Internal / External Oversight

Section VI – PREA Investigations

Section VIII – Data Comparison

Section IX – Goals for 2026

The assessment is signed and dated by the PREA Compliance Manager, Warden and

PREA Coordinator.

(b) The Nebraska State Penitentiary PAQ states the annual report includes a comparison of the current year's data and corrective actions to those from prior years. The annual report provides an assessment of the agency's progress in addressing sexual abuse.

The facility provided the Nebraska Department of Correctional Services Annual PREA Assessment 2025. The report compares the following data from years 2020-2025.

· Introduction of PREA

o Assessment of NCDS Compliance with Federal PREA Standards

o Victim Advocacy

o Supervision and Monitoring

o Investigation Tracking and Data Analysis

o 2025 Investigation Executive Summary

o Investigation Outcomes

o Facility Performance Summary

o Data submitted to the U.S. Department of Justice – Years 2020-2025

The annual PREA Assessment is signed by the PREA Coordinator, Agency Security Administrator and the Deputy Assistant Director.

(c) The Nebraska State Penitentiary PAQ states the agency makes its annual report readily available to the public, at least annually, through its website at https://corrections.nebraska.gov/about/prison-rape-elimination-act

(d) The Nebraska State Penitentiary PAQ states when the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility. The agency indicates the nature of material redacted.

	Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Nebraska State Penitentiary PAQ 2. Schedule 92, Nebraska Department of Correctional Services, dated 12.12.2011 (a) The Nebraska State Penitentiary PAQ states the agency ensures that incident-based and aggregate data are securely retained. The facility provide Schedule 92, Nebraska Department of Correctional Services, demonstrating the State mandates Correction Inmate Tracking (CIT) Correction Tracking System (CTS), Website and Siebel Reports. (b) The Nebraska State Penitentiary PAQ states agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website at website at https://corrections.nebraska.gov/about/p-rison-rape-elimination-act-0. (c/d) The Nebraska State Penitentiary PAQ states before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. The agency maintains sexual abuse data collected pursuant to §115.87 for at least 10 years after the date of initial collection, unless federal, state, or local law requires otherwise. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.401	Frequency and scope of audits

	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	(a) During the prior three-year audit period, the agency ensured that each facility operated was audited, once. (b) This is the fifth audit cycle for Nebraska State Penitentiary and the second year of the fourth audit cycle. (h) The Auditor was granted complete access to, and the ability to observe, all areas of the facility. (i) The Auditor was permitted to request and receive copies of any relevant documents (including electronically stored information). (m) The Auditor was permitted to conduct private interviews with residents. (n) Residents were permitted to send confidential information or correspondence to the Auditor in the same manner as if they were communicating with legal counsel. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.403	**Audit contents and findings**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	(b) The agency has posted the current 2024 PREA audit report, on their website. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

Appendix: Provision Findings		
115.11 (a)	**Zero tolerance of sexual abuse and sexual harassment; PREA coordinator**	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.11 (b)	**Zero tolerance of sexual abuse and sexual harassment; PREA coordinator**	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
115.11 (c)	**Zero tolerance of sexual abuse and sexual harassment; PREA coordinator**	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
115.12 (a)	**Contracting with other entities for the confinement of inmates**	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na
115.12 (b)	**Contracting with other entities for the confinement of inmates**	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure	na

	that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	
115.13 (a)	**Supervision and monitoring**	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility’s physical plant (including “blind-spots” or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into	yes

	consideration: Any applicable State or local laws, regulations, or standards?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	**Supervision and monitoring**	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
115.13 (c)	**Supervision and monitoring**	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility’s deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.13 (d)	**Supervision and monitoring**	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

115.14 (a)	**Youthful inmates**	
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (b)	**Youthful inmates**	
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (c)	**Youthful inmates**	
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.15 (a)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.15 (b)	**Limits to cross-gender viewing and searches**	
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	na
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the	na

	facility does not have female inmates.)	
115.15 (c)	**Limits to cross-gender viewing and searches**	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	na
115.15 (d)	**Limits to cross-gender viewing and searches**	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	**Limits to cross-gender viewing and searches**	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.15 (f)	**Limits to cross-gender viewing and searches**	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.16 (a)	**Inmates with disabilities and inmates who are limited English proficient**	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?	yes

	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
115.16 (b)	**Inmates with disabilities and inmates who are limited English proficient**	

	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.16 (c)	**Inmates with disabilities and inmates who are limited English proficient**	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
115.17 (a)	**Hiring and promotion decisions**	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to	yes

	consent or refuse?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b)	**Hiring and promotion decisions**	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c)	**Hiring and promotion decisions**	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d)	**Hiring and promotion decisions**	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
115.17 (e)	**Hiring and promotion decisions**	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
115.17 (f)	**Hiring and promotion decisions**	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have	yes

	contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	**Hiring and promotion decisions**	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	**Hiring and promotion decisions**	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	**Upgrades to facilities and technologies**	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	**Upgrades to facilities and technologies**	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.21 (a)	**Evidence protocol and forensic medical examinations**	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the	yes

	agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	
115.21 (b)	**Evidence protocol and forensic medical examinations**	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/ Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (c)	**Evidence protocol and forensic medical examinations**	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	**Evidence protocol and forensic medical examinations**	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes

	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	**Evidence protocol and forensic medical examinations**	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	**Evidence protocol and forensic medical examinations**	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
115.21 (h)	**Evidence protocol and forensic medical examinations**	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	yes
115.22 (a)	**Policies to ensure referrals of allegations for investigations**	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.22 (b)	**Policies to ensure referrals of allegations for investigations**	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes

	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	**Policies to ensure referrals of allegations for investigations**	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
115.31 (a)	**Employee training**	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates’ right to be free from sexual abuse and sexual harassment	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the agency train all employees who may have contact with	yes

	inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	
115.31 (b)	**Employee training**	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	**Employee training**	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	**Employee training**	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	**Volunteer and contractor training**	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	**Volunteer and contractor training**	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	**Volunteer and contractor training**	

	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	**Inmate education**	
	During intake, do inmates receive information explaining the agency’s zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	**Inmate education**	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	**Inmate education**	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate’s new facility differ from those of the previous facility?	yes
115.33 (d)	**Inmate education**	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes

	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes
115.33 (e)	**Inmate education**	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
115.33 (f)	**Inmate education**	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes
115.34 (a)	**Specialized training: Investigations**	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (b)	**Specialized training: Investigations**	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	**Specialized training: Investigations**	

	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.35 (a)	**Specialized training: Medical and mental health care**	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (b)	**Specialized training: Medical and mental health care**	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	yes
115.35 (c)	**Specialized training: Medical and mental health care**	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental	yes

	health care practitioners who work regularly in its facilities.)	
115.35 (d)	**Specialized training: Medical and mental health care**	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	**Screening for risk of victimization and abusiveness**	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	**Screening for risk of victimization and abusiveness**	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	**Screening for risk of victimization and abusiveness**	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
115.41 (d)	**Screening for risk of victimization and abusiveness**	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following	yes

	criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate’s criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate’s own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes
115.41 (e)	**Screening for risk of victimization and abusiveness**	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	**Screening for risk of victimization and abusiveness**	
	Within a set time period not more than 30 days from the inmate’s arrival at the facility, does the facility reassess the inmate’s risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate’s risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate’s risk level when warranted due to a request?	yes
	Does the facility reassess an inmate’s risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate’s risk level when warranted due to receipt of additional information that bears on the inmate’s risk of sexual victimization or abusiveness?	yes
115.41 (h)	**Screening for risk of victimization and abusiveness**	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.41 (i)	**Screening for risk of victimization and abusiveness**	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate’s detriment by staff or other inmates?	yes
115.42 (a)	**Use of screening information**	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of	yes

	being sexually abusive, to inform: Education Assignments?	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.42 (b)	**Use of screening information**	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
115.42 (c)	**Use of screening information**	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (d)	**Use of screening information**	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (e)	**Use of screening information**	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (f)	**Use of screening information**	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (g)	**Use of screening information**	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.43 (a)	**Protective Custody**	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
115.43 (b)	**Protective Custody**	
	Do inmates who are placed in segregated housing because they	yes

	are at high risk of sexual victimization have access to: Programs to the extent possible?	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
115.43 (c)	**Protective Custody**	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
115.43 (d)	**Protective Custody**	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility’s concern for the inmate’s safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation	yes

	can be arranged?	
115.43 (e)	**Protective Custody**	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.51 (a)	**Inmate reporting**	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.51 (b)	**Inmate reporting**	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
115.51 (c)	**Inmate reporting**	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	**Inmate reporting**	

	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	**Exhaustion of administrative remedies**	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.52 (b)	**Exhaustion of administrative remedies**	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	**Exhaustion of administrative remedies**	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.52 (d)	**Exhaustion of administrative remedies**	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision,	yes

	does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.52 (e)	**Exhaustion of administrative remedies**	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate’s decision? (N/A if agency is exempt from this standard.)	yes
115.52 (f)	**Exhaustion of administrative remedies**	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.).	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days?	yes

	(N/A if agency is exempt from this standard.)	
	Does the initial response and final agency decision document the agency’s determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency’s action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency’s final decision document the agency’s action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	**Exhaustion of administrative remedies**	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	**Inmate access to outside confidential support services**	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	na
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	**Inmate access to outside confidential support services**	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	**Inmate access to outside confidential support services**	
	Does the agency maintain or attempt to enter into memoranda of	yes

	understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	**Third-party reporting**	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	**Staff and agency reporting duties**	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.61 (b)	**Staff and agency reporting duties**	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.61 (c)	**Staff and agency reporting duties**	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner’s duty to report, and the limitations of	yes

	confidentiality, at the initiation of services?	
115.61 (d)	**Staff and agency reporting duties**	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	**Staff and agency reporting duties**	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.62 (a)	**Agency protection duties**	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	**Reporting to other confinement facilities**	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	**Reporting to other confinement facilities**	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.63 (c)	**Reporting to other confinement facilities**	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	**Reporting to other confinement facilities**	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	**Staff first responder duties**	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report	yes

	required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.64 (b)	**Staff first responder duties**	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	**Coordinated response**	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
115.66 (a)	**Preservation of ability to protect inmates from contact with abusers**	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency’s behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency’s ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	**Agency protection against retaliation**	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate	yes

	with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	**Agency protection against retaliation**	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	**Agency protection against retaliation**	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes

	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	**Agency protection against retaliation**	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	**Agency protection against retaliation**	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	**Post-allegation protective custody**	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	**Criminal and administrative agency investigations**	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/ facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
115.71 (b)	**Criminal and administrative agency investigations**	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	**Criminal and administrative agency investigations**	
	Do investigators gather and preserve direct and circumstantial	yes

	evidence, including any available physical and DNA evidence and any available electronic monitoring data?	
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	**Criminal and administrative agency investigations**	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	**Criminal and administrative agency investigations**	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual’s status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	**Criminal and administrative agency investigations**	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	**Criminal and administrative agency investigations**	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	**Criminal and administrative agency investigations**	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	**Criminal and administrative agency investigations**	

	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	**Criminal and administrative agency investigations**	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	**Criminal and administrative agency investigations**	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.72 (a)	**Evidentiary standard for administrative investigations**	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	**Reporting to inmates**	
	Following an investigation into an inmate’s allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.73 (b)	**Reporting to inmates**	
	If the agency did not conduct the investigation into an inmate’s allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
115.73 (c)	**Reporting to inmates**	
	Following an inmate’s allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate’s unit?	yes
	Following an inmate’s allegation that a staff member has	yes

	committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	**Reporting to inmates**	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (e)	**Reporting to inmates**	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	**Disciplinary sanctions for staff**	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	**Disciplinary sanctions for staff**	
	Is termination the presumptive disciplinary sanction for staff who	yes

	have engaged in sexual abuse?	
115.76 (c)	**Disciplinary sanctions for staff**	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member’s disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	**Disciplinary sanctions for staff**	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.77 (a)	**Corrective action for contractors and volunteers**	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	**Corrective action for contractors and volunteers**	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	**Disciplinary sanctions for inmates**	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	**Disciplinary sanctions for inmates**	

	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	**Disciplinary sanctions for inmates**	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	**Disciplinary sanctions for inmates**	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	**Disciplinary sanctions for inmates**	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.78 (f)	**Disciplinary sanctions for inmates**	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
115.78 (g)	**Disciplinary sanctions for inmates**	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
115.81 (b)	**Medical and mental health screenings; history of sexual abuse**	

	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
115.81 (c)	**Medical and mental health screenings; history of sexual abuse**	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
115.81 (d)	**Medical and mental health screenings; history of sexual abuse**	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	**Medical and mental health screenings; history of sexual abuse**	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
115.82 (a)	**Access to emergency medical and mental health services**	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	**Access to emergency medical and mental health services**	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes

115.82 (c)	**Access to emergency medical and mental health services**	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	**Access to emergency medical and mental health services**	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
115.83 (e)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	If pregnancy results from the conduct described in paragraph §	na

	115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	
115.83 (f)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes
115.86 (a)	**Sexual abuse incident reviews**	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.86 (b)	**Sexual abuse incident reviews**	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	**Sexual abuse incident reviews**	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	**Sexual abuse incident reviews**	

	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	**Sexual abuse incident reviews**	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.87 (a)	**Data collection**	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	**Data collection**	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	**Data collection**	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	**Data collection**	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports,	yes

	investigation files, and sexual abuse incident reviews?	
115.87 (e)	**Data collection**	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
115.87 (f)	**Data collection**	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.88 (a)	**Data review for corrective action**	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.88 (b)	**Data review for corrective action**	
	Does the agency’s annual report include a comparison of the current year’s data and corrective actions with those from prior years and provide an assessment of the agency’s progress in addressing sexual abuse?	yes
115.88 (c)	**Data review for corrective action**	
	Is the agency’s annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	**Data review for corrective action**	
	Does the agency indicate the nature of the material redacted	yes

	where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	
115.89 (a)	**Data storage, publication, and destruction**	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	**Data storage, publication, and destruction**	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	**Data storage, publication, and destruction**	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	**Data storage, publication, and destruction**	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	**Frequency and scope of audits**	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	**Frequency and scope of audits**	
	Is this the first year of the current audit cycle? (Note: a “no” response does not impact overall compliance with this standard.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	yes
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by	yes

	the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	
115.401 (h)	**Frequency and scope of audits**	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	**Frequency and scope of audits**	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	**Frequency and scope of audits**	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	**Frequency and scope of audits**	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403 (f)	**Audit contents and findings**	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes